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## North Coast Regional Water Quality Control Board

### **Response to Written Comments**

### **Waste Discharge Requirements Order No. R1-2021-0024 for**

### **COUNTY OF MENDOCINO**

### **CLOSURE OF SOUTH COAST CLASS III SOLID WASTE DISPOSAL SITE**

### **WDID No. 1B770232OMEN**

### **Mendocino County**

### **Regional Water Quality Control Board, North Coast Region June 17, 2021**

#### **Comments Received**

The Draft Waste Discharge Requirements Order No. R1-2021-0024 package for the County of Mendocino Closure of South Coast Class III Solid Waste Disposal Site was open for public comments from February 18, 2020 to April 6, 2021. Regional Water Board staff (Staff) received one written comment package (Comment Package) submitted by the facility owner and “Discharger”, Mendocino County Department of Transportation (MCDOT), Deputy Director, Amber Fisette. No other written response was received within the public comment period.

This Response to Comments document includes the comments received from the commenters, Regional Water Board staff responses, and staff-initiated changes. This document summarizes comments received, followed by the Staff response. The term “Draft Order” refers to the version of the permit that was sent out for public comment. The term “Proposed Order” refers to the version of the permit that has been modified in response to comments and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

The Dischargers “Comment Package” was transmitted, received and dated April 1, 2021. The Comment Package contains six attachments including the Dischargers (MCDOT) comments along with those of their consulting team:

1. MCDOT Transmittal letter, April 1, 2021
2. MCDOT WDR and MRP Comments, April 1, 2021
3. SHN Consulting Engineers and Geologists Inc., WDR and MRP comments, Appendix 1, March 25, 2021
4. SWT Civil and Environmental Engineering, Update Figure, Replacement Attachment F
5. WatershedGeo Comments, email March 29, 2021, and Attachment #6
6. ClosureTurf® Owners Post Closure Care Manual, WatershedGeo, November 2019

Regional Board staff have reviewed and responded to the Dischargers Comment Package below noting that the comments are divided into General Comments (the majority of their comments) and several Specific Comments which are covered first.

**Specific Comments:**

- 1) The Draft Order requires obtaining and maintaining the manufacturer's Performance Assurance Policy for the 30-year Post Closure Maintenance period as a condition for constructing a turf based- Engineered Alternative Cap (EAD) cap. MCDOT has stipulated to purchase the manufacturer's ClosureTurf® Performance Assurance Policy for a 5-year period, with an option to extend. MCDOT comment states they have not agreed to purchase a 30-year plan with the manufacturer as it may be very costly or unattainable and that they are required to maintain adequate financial assurances of financial responsibility under the Draft Order and current regulations.

**Response to Specific Comment 1:** Staff believe an appropriately funded financial assurance plan is needed for the life of the cap as defined in title 27 of the California Code of Regulations for Solid Waste. The Discharger has indicated the manufacturer's policy may not be available for the life of the cap and an equivalent alternative may be needed. Staff concur and have accordingly revised condition No. 50 to include the following:

"In its Report of Waste Discharge application, and again following release of the draft Order, the Discharger identified and agreed to purchase and maintain a Watershed Geosynthetics LLC ClosureTurf® Performance Assurance Policy for the first 5 years (with an option to extend) of the 30 years required to satisfy applicable post closure maintenance requirements in title 27, section 21769, and engineered alternative design requirements pursuant to title 27, section 20080 (b). If the Discharger cannot maintain a Watershed Geosynthetics LLC ClosureTurf® Performance Assurance Policy, the Discharger may implement an equivalent policy subject to Executive Officer approval. The equivalent policy shall have sufficient detail and specifications to meet title 27, section 21769 requirements pertaining to long term maintenance and related costs including but

not limited to: inspection, monitoring, performance, integrity, repair and possible replacement throughout the 30 year post closure period. Any approved policy must also meet title 27, section 20080 (b) requirements to ensure the engineered alternative design offers an equivalent level of water quality protection.”

- 2) Reference is made to the Monitoring and Reporting Program sections addressing Unsaturated Zone Monitoring (MRP page 12, Item 1d and other related sections) gas well labels and sampling locations. The Discharger and SHN comments state that wells LFGW-1 and LFGW-2 are no longer used and should be removed, and that gas well labelling be updated to include P-1, P-2 and P-3 with P-3 being added to the MRP.

**Response to Specific Comment 2:** Staff agree to proposed changes and have made the updates and edits to the WDR, Attachments and MRP in response to the Discharger and SHN comments on Unsaturated Zone Monitoring labeling and locations.

### **General Comments:**

The Dischargers Comment Package contains various suggested changes to accommodate their construction project, long term operations and post closure monitoring. Staff have reviewed these proposed changes and found them reasonable, and staff are in support of amending the Draft Order accordingly for:

**WDR:** Tabular changes, map labelling updates, clarifying information, updated nomenclature, table and typographical errors.

**Attachments:** Updates for site maps: Attachment B and C for labelling locations, Replacement Attachment F with updated construction details.

**MRP:** Discharger comments addressing and clarifying surface water sampling locations, observation locations, reporting periods for groundwater, unsaturated zone and 5-year Constituents of Concern, typographical changes for tables and labels.

### **Response to General Comments:**

Staff have reviewed the comments and additional clarifying information provided by the Discharger. Staff responses and explanation for modifications made to the WDR, Attachments and MRP are summarized in Attachment 1.

**Staff Initiated Changes**

The following section describes changes made to the proposed Permit by Staff based on information or considerations of Regional Water Board Staff after the Draft Permit was released for public comment

**1) Staff have updated the FINDINGS: PROCEDURAL REQUIREMENTS AND OTHER CONSIDERATIONS, Item 65 as follows:**

65. Draft Order: “The Basin Plan includes water quality objectives and receiving water limitations.”

65. Proposed Order Revision: “The Basin Plan includes water quality objectives and waste discharge prohibitions, established for the reasonable protection of beneficial uses.”

**2) Staff have updated the REQUIREMENTS: CLOSURE SPECIFICATIONS, Item 10 as follows:**

10. The Discharger shall maintain Post Closure Maintenance Plans and Post Closure Financial Assurances for a minimum of 30 years for the facility. The Discharger agreed to purchase and maintain a Watershed Geosynthetics LLC ClosureTurf® Performance Assurance Policy for the first 5 years of the required 30 year post closure period. If the Discharger cannot maintain a Watershed Geosynthetics LLC ClosureTurf® Performance Assurance Policy, the Discharger may implement an equivalent policy subject to Executive Officer approval. The equivalent policy shall have sufficient detail and specifications to meet title 27, section 21769 requirements pertaining to long term maintenance and related costs including but not limited to: inspection, monitoring, performance, integrity, repair and possible replacement. Any approved policy must also meet title 27, section 20080 (b) requirements to ensure the engineered design alternative offers an equivalent level of water quality protection.

Attachment 1 – Response to Comments Table

SouthCoastReponseToComments

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**Mendocino County Department of Transportation Review Comments**

No.	Order Section	Comments	RWQCB Response to Comments
1	ORDER, Page 2, Item 9	Item #9 makes reference to nine leachate storage tanks. There are 12 leachate storage tanks on the landfill, 9 on the south side and 3 on the north side by the transfer station. All tanks are rated at 2,500 gallon capacity each.	Change Accepted: "The LCRS system is piped to twelve storage tanks that have a total capacity of 30,000 gallons of leachate."
2	ORDER, Page 5, Item 21	Item #21 makes reference to a culvert at the northern sedimentation pond (SW-2) that discharges to the Little North Fork Gualala River and that the culvert will be replaced during closure construction. Reference is also made to the southern sedimentation pond (SW-1). The culvert at SW-2 discharges to an unnamed tributary to the Little North Fork Gualala River and the Department has not been working with the Water Board towards a culvert replacement at this location. The Department has been working with the Water Board towards replacing the culvert at the southern sedimentation pond (SW-1) that does discharge to the Little North Fork Gualala River. Please clarify that the culvert at the southern sedimentation pond (SW-1) is to be replaced (as shown in Attachment B).	Change Accepted: "The northern sedimentation pond outfalls to a ravine that then discharges to the Little North Fork of the Gualala River. The southern sedimentation pond discharges to the Little North Fork of the Gualala River via a culvert that will be replaced during closure construction."
3	ORDER, Page 8, Item 42	Please include verbiage to clarify well status: LFGW-1 and LFGW-2 are no longer used, P-1, P-2 and P-3 are currently monitored.	Change Accepted: "Currently the Site has two gas monitoring wells LFGW-1 and LFGW-2 placed during the initial subsurface investigations and three multiple depth gas monitoring wells placed in 2012, P-1, P-2, and P-3. LFGW-1 consists of two probes installed to a depth of 20 feet; LFGW-2 is a single probe installed to a depth of 11 feet and are not currently sampled; P-1 was installed to 20 feet; P-2 was installed to 52 feet; and P-3

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			was installed to a depth of 21 feet. Only P-1 through P-3 are still sampled. P-1 has two sampling probes (10 and 19.5 feet), and P-2 has three sampling probes (10, 26 and 52 feet)."
4	ORDER, Page 8, Item 45	Item #45 makes reference to a single leachate tank farm, there are two leachate tank farms at locations shown on Attachments C and D.	Change Accepted: "The leachate is gravity fed to two leachate tank farms and disposed of at the GCSD."
5	ORDER, Page 8, Item 48	Item #48 makes reference to replacing culverts and energy dissipaters below two sedimentation ponds. The Department has been through a design-review-redesign process with regards to the culvert replacement at SW-1. There has been no such previous concern for rebuilding the culvert and energy dissipater below SW-2. On July 13, 2018, the culvert system below SW-2 was inspected with Scott Gergus of the Water Board and it was observed that several culvert bands had become undone. The culvert system was repaired at a later date.	Change Accepted: "The existing erosion and sediment control systems include drain conveyances to collect runoff from the WMU and two sedimentation ponds, one in the southern area and one in the northern area. Two sedimentation ponds will be enlarged during closure to handle the increased discharge. The culvert and energy dissipator downstream of the southern sedimentation pond will also be rebuilt during closure construction. The drainage system is shown on Attachment B."
6	ORDER, Page 9 Item 50, Page 10 Item 56, Page 20 Item 17	The Mendocino County Department of Transportation (Discharger) has previously agreed to a 5 year Performance Assurance Policy with the option to extend. The Department has not agreed to a 30 year Performance Assurance Policy. The purchase of a 30 year maintenance agreement with Watershed Geosynthetics LLC Closure turf as sole source may be very costly or unattainable. Item No. 16 requires that the Discharger shall obtain and maintain adequate assurances of financial responsibility for closure, post-closure maintenance, and corrective action for all known and reasonably	Page 9 Item 50. Change Accepted: In its Report of Waste Discharge application, and again following release of the draft Order, the Discharger identified and agreed to purchase and maintain a Watershed Geosynthetics LLC ClosureTurf® Performance Assurance Policy for the first 5 years (with an option to extend) of the 30 years required to satisfy applicable post closure maintenance requirements in title 27, section 21769, and engineered alternative design requirements pursuant to title 27, section 20080 (b). If the Discharger cannot maintain a Watershed

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		foreseeable releases from a WMU at the facility in accordance with California Code of Regulations.	<p>Geosynthetics LLC ClosureTurf® Performance Assurance Policy, the Discharger may implement an equivalent policy subject to Executive Officer approval. The equivalent policy shall have sufficient detail and specifications to meet title 27, section 21769 requirements pertaining to long term maintenance and related costs including but not limited to: inspection, monitoring, performance, integrity, repair and possible replacement throughout the 30 year post closure period. Any approved policy must also meet title 27, section 20080 (b) requirements to ensure the engineered alternative design offers an equivalent level of water quality protection.</p> <p>Page 10 Item 56: Deleted (addressed in amended Page 9, Item 50 above)</p> <p>Page 20 Item 17. Change Accepted: " The Discharger is required to update approved post-closure and corrective action cost estimates annually to account for inflation, in accordance with California Code of Regulations, title 27, section 22236. In addition, the Discharger will maintain a Watershed Geosynthetic LLC ClosureTurf® Performance Assurance Policy or an equivalent policy or plan pursuant to Executive Officer approval for 30 years. Documentation of the updated cost estimate and proof of the policy shall be submitted by June 1 of each year."</p>

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7	ORDER, Page 11, Item 62	Unable to locate the referenced code sections. Please confirm and correct code references.	Change Accepted: "The completed final cover will be periodically tested for damage or defects by monitoring surface emissions pursuant to current regulations and Title 27, section 21090(a)(4)(A)."
8	ORDER, Page 11, Item 63	Please change reference from the Mendocino County Planning Department to Mendocino County Board of Supervisors.	Change Accepted: "The Negative Declaration was approved by the Mendocino County Board of Supervisors in the third quarter of 2013. A second Initial study Addendum to the Initial Study/Mitigated Negative Declaration for the Proposed Final Closure/Post-Closure Maintenance Plan for the South Coast Landfill, prepared by Mendocino County Department of Transportation was approved by the Mendocino Board of Supervisors Resolution No. 17-096 on July 11, 2017."
9	ORDER, Page 15, Item 10	<p>(1) Order states that disturbed areas not covered by closure turf be seeded with an appropriate vegetation mixture to minimize erosion and sedimentation. Remove the exclusive reference to "seeding" as this may not be the most appropriate treatment. Please amend to state that areas must be treated or stabilized to minimize erosion and sedimentation.</p> <p>(2) Request that the requirement to inspect erosion control measures during major storms be removed because this may not always be possible due to remoteness, road closures and obvious safety concerns during major storms.</p> <p>(3) Order specifies that sediment basins and other structures be cleaned out as necessary during the rainy season to maintain adequate capacity. Please reword to state "<i>cleaned out during the rainy season</i>"</p>	Change Accepted: "All disturbed areas not covered by ClosureTurf® shall be stabilized with an appropriate vegetation mixture to minimize erosion and sedimentation. Rainfall runoff shall be channeled through sedimentation basins or other appropriate structures to minimize sedimentation in surface drainage courses downgradient of the Site. The Discharger shall inspect erosion control measures before, and after major storms or at least once a month through the wet season. Sedimentation basins and other appropriate structures shall be cleaned out during the rainy season as feasible and necessary to maintain adequate sedimentation capacity. By October 15, annually, the Discharger shall submit a report to the Executive Officer describing measures taken to comply with this provision as per the Monitoring and Reporting Program."



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		<p><i>as feasible and necessary</i>". (4) The report due date of October 15, annually, is out of context with the intent of this section. Please include the requirement for the Annual Erosion Control Report as required by the MRP as a separate item.</p>	
10	ORDER, Page 15, Item 11	Is the provision to ensure erosion controls are functional and effective prior to a likely rain event throughout the post closure period or is this provision intended for active or recently completed areas that are not stabilized? If under item #10 this is understandable, if under the post closure period this is preposterous in consideration of the other monitoring requirements.	Change Accepted; "No later than 24 hours prior to a likely rain event, the Discharger shall ensure erosion controls are functional and effective for all active areas or areas that have not been stabilized. A likely rain event is any weather pattern that is forecast to have a 50% or greater probability of producing 0.5" precipitation event at the Site area. The Discharger shall print and keep for record a copy of precipitation forecast information from the National Weather Service Forecast Office."
11	ORDER, Page 15, Item 13	The requirement to supplement sand ballast if erodes down to the specified thickness is not standard practice and is suggested to have this requirement removed. Included with comments are an email from WatershedGeo discussing the above statement and a WatershedGeo post- closure care manual for reference.	Change Accepted: "For sand ballast/artificial turf areas, the Discharger shall replace sand ballast if it erodes below the following thickness: roads and benches – 0.9 inches, if they are used as driving surfaces; top deck – 0.5 inches; and slopes – 0.4-inches."
12	ORDER, Page 16, Item 3	Please correct permeability from $10^{-6}$ cm/sec. to $1 \times 10^{-6}$ cm/sec.	Change Accepted: "Final cover of the Class III WMU shall consist of at least 24 inches of compacted foundation material, overlain by an engineered alternative barrier layer of 60-mil LLDPE Super Grip Net™ geomembrane having a permeability of greater than $1 \times 10^{-6}$ cm/sec."

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13	ORDER , Page 19, Item 12	Fourth line, please change SWDS footprint to WMU footprint.	Change Accepted: "By January 2027, and at least every five years thereafter, the Discharger shall produce and submit to the Regional Water Board an iso-settlement map accurately depicting the estimated total change in elevation of the final cover's low-hydraulic-conductivity layer for the Class III Waste Management Unit footprint."
14	ORDER , Page 20, Item 17	Please reword first sentence to "The Discharger is required to update approved post-closure costs and corrective action cost estimates annually to account for inflation, in accordance with California Code of Regulations, title 27, section 22236.	Change Accepted: "The Discharger is required to update approved post-closure and corrective action cost estimates annually to account for inflation, in accordance with California Code of Regulations, title 27, section 22236. In addition, the Discharger will maintain a Watershed Geosynthetic LLC ClosureTurf® Performance Assurance Policy or an equivalent policy or plan pursuant to Executive Officer approval for 30 years."
15	ORDER , Page 21, Item 20	Please reword to "..... pay from the pledged revenue or corrective action fund....."	Change Accepted: "In the event that the Regional Water Board determines that the Discharger has failed to pay or is failing to perform corrective action as required by law, the Regional Water Board may request that CalRecycle direct the Discharger to pay from the pledged revenue or corrective action fund such amounts as are necessary to ensure sufficient corrective action."
16	ORDER, Page 21, Item 21	Please change immediately to within 24 hours.	Change Accepted: "The Discharger shall within 24 hours notify the Regional Water Board of any flooding, equipment failure, slope failure, or other change in Site conditions that could impair the integrity of waste or leachate containment facilities or of precipitation and drainage control structures."

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17	ORDER, Page 26, Item 43	See above comments for ORDER, Page 8, Item #48. The requested information for the culvert at SW-1 has been previously submitted I in September 2019.	Change Accepted: "The final design and work plan for culvert, energy dissipation, and rock-lined channels for the sedimentation ponds shall be incorporated into the Final Closure Plan and implemented at the time of construction."
18	ORDER, Page 26, Item 44	Please change reference to the SWDS to WMU or clarify that iso-settlement mapping is for the WMU, not the entire property.	Change Accepted: "In accordance with title 27, an iso-settlement map shall be submitted by January 31, 2027, and every five years thereafter; a Certification of Closure (Cal. Code Regs, title 27, § 21880) for the Class III WMU shall be submitted within 180 days of the completion of construction activities, but no later than March 31, 2023."
19	ORDER, Attachment C	Two separate wells labeled P-1 are shown. P-1 by the front gate is actually P-2.	Change Accepted: Attachment C, label "P-1" by front gate was changed to "P-2".
20	ORDER, Attachment F	Sheet D1 of 13 is the old detail sheet prior to the Closure Turf submittal and has been updated. An updated Attachment F is included with the comment submittals for inclusion into the ORDER.	Change Accepted: Updated Attachment F has replaced the draft Attachment F.
21	MRP, page 2, section I, first paragraph	Please include verbiage that Order No. R1-2021-XXXX supersedes the previous two orders to avoid confusion over older superseded requirements.	Change Accepted: "The Discharger shall report monitoring data and information as required in this MRP and as required in Waste Discharge Requirements Order No. (WDRs) R1-2021-0024."
22	MRP, Page5 Item 9B, Page 11 Item II. A.	Please consider some rewording to avoid multiple inspections over a one week period: "The standard observations shall be performed monthly during the rainy season (October through May); quarterly during the dry season (June through September); and no less than once weekly after rainfall events of more than 1.0 inches in 24 hours."	Change(s) Accepted: Page 5 Item 9B, "The standard observations shall be performed monthly during the rainy season (October through May); quarterly during the dry season (June through September); and weekly after rainfall events of more than 1.0 inches in 24 hours." Page 11 Item II. A: "The SWDS shall be inspected monthly during the rainy season (October

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			through May), once during the summer (June through September), and weekly after rainfall events of more than 1.0 inches in 24 hours per Section I."
23	MRP, Page 5 Item 9c	Do observation stations on the NOAA website qualify? Currently the Department is using DW9883 Gualala, CA. D9883 (APRSWXNET/CWOP).	Change Accepted: "Daily rainfall shall be tracked at either an on-site weather gauge or at the nearest NOAA weather station and the daily rainfall data shall be included in each semi-annual monitoring report'. Yes the listed website qualifies.
24	MRP, Page 5 Item 9d	Include differential settlement.	Change Accepted: "The standard observations shall include: condition of WMU cover; including any exposed turf without ballast sand, assessment of migrating sand, worn or deteriorated turf, exposed low permeability liner, whether storm water drainage ditches and sedimentation ponds contain sands or liquids; condition of drainage facilities; condition of sedimentation ponds; whether there are any leachate seeps present, including estimates of seep size and flow; presence of odors; evidence of ponding; freeboard in leachate holding facilities; evidence of erosion or potential erosion; slope failures or potential slope failures; <u>differential settlement</u> , inspection of storm water discharge locations for evidence of non-storm water discharges; evidence of floating and suspended material or plastics, including plastic fibers or microfibers from the turf cap, or discoloration or turbidity in the receiving waters; presence of odors in the receiving waters; condition of access roads; other problems which could affect compliance with the WDRs; and weather conditions during the standard observations and the precipitation

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			during the five days preceding the observations that were made during the monitoring period."
25	MRP, Page 6	The reporting date of January 15 <sup>th</sup> for the period of July through December does not allow sufficient time to report on activities that occurred in December, especially in the case of surface and groundwater monitoring that has to go to a laboratory for analysis before data can be analyzed and the report can be written. The same goes for the July 15 <sup>th</sup> reporting deadline. Please consider changing dates to March 15 and August 31 as in Order No. R1-2018-0059 for the Laytonville Landfill to allow adequate time for reporting and for consistency in reporting requirements	Change Accepted: "January through June, Period 1, Due August 31" and "July through December, Period 2, March 15."
26	MRP, page 12 Item 1 C	Table C should be D.	Change Accepted:, "Surface Water/Storm Water – SW-1, SW-2, Table D."
27	MRP, Page 12, Item 1d, and other sections referencing unsaturated zone monitoring	Reference is made to Gas well P-1. On Attachment C of the WDRs there are two wells labeled as P-1. Well P-1 is referenced many times throughout the document. Gas well P-2 (miss labeled as Gas P-1) has LFGW-1 on one side and LFGW-2 on the other side both within close proximity and no longer used. Well P-2 should be considered adequate for unsaturated zone monitoring on that side of the landfill.	Change Accepted: "Unsaturated Zone – P-1, P-2, P-3, and any new landfill gas well(s), once they are installed. All shall have VOC monitoring by TO-15."
28	MRP, Page 13, Item F	States that gas wells will be analyzed for VOC vapors in Fall 2022 and Spring 2023. Page 14 states Fall 2021 and Spring 2022. Please confirm and correct the correct dates.	Change(s) Accepted: Page 13, Item F, "Since the SWDS does not have pan lysimeters, the existing landfill gas monitoring wells that will be used for unsaturated zone monitoring are P-1, P-2 and P-3. In addition to the landfill gas monitoring required by

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			CalRecycle, gas probes P-1 and P-2 will be analyzed for VOC vapors using TO-15 in fall 2022 and spring 2023 during regular probe sampling." Page 14. B.2: "Monitoring Schedule", P-1, P-2 and P-3 will be analyzed for VOC vapors using TO-15 in fall 2022 and spring 2023 during regular probe sampling."
29	MRP, Page 12, Item 2	States that ground water wells will be sampled for COCs in fall 2022 and spring 2026. Page 9 Item 8 states fall 2023 and spring 2028. Please confirm and correct the correct dates.	Change Accepted: Page 12, Item 2, "Groundwater monitoring wells shall be sampled for COCs in Fall 2023, Spring 2028, and every five years thereafter alternating between seasons." This matches Page 9, Item 8: Fall 2023, Spring 2028.
30	MRP Page 12 Item C and MRP, Page 15, Item C	Leachate sampling mentions the leachate tank farm, there are two leachate tank farms. Which one or both?	Change Accepted: Response "both". Page 12, Item C, "Samples shall be taken from <u>both</u> of the Leachate Tank Farms at their respective sampling port and any new leachate sampling wells once installed. Leachate shall be vacuum-pumped from storage tanks and transported to an approved wastewater treatment facility and legal place of disposal. Any results from leachate sampling required by the wastewater treatment facility shall be reported to the Regional Water Board." Page 15, Item C, "Leachate – Samples will be taken from <u>both</u> of the Leachate Tank Farms at the sampling port located within the collection system storage area once per year in the 4th quarter (October- December)."
31	MRP, Page 14, Item B2	States that gas probes will be analyzed for VOC vapors in fall 2021 and spring 2022. Page 13 Item F states fall 2022 and spring 2023. Please confirm and correct the correct dates.	Change Accepted: Page 14, Item B2, "P-1, P-2 and P-3 will be analyzed for VOC vapors using TO-15 in fall 2022 and spring 2023 during regular probe sampling." This matches Page 13 Item F.

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32	MRP, Page 15, Item C.1.b	Unable to locate Table IIIB. Reference is made to leachate sampling frequencies in Table B that is for unsaturated zone detection monitoring.	Change Accepted: "Seeps - If new seeps are detected, the Discharger shall immediately sample the seepage and test for field parameters and monitoring parameters listed in Table C and continue to sample seepage and report test results at frequencies listed in Table B. If the seep has been determined to contain leachate, the Discharger shall abate the discharge."
33	ORDER, Page 7, Item 41 MRP, Page 17, Item D.1	ORDER makes reference to SW-1 and SW-2 as being storm water/surface water monitoring points with OF-1 and OF-2 being erosion observation points. MRP makes reference to SW-1, SW-2, OF-1 and OF-2 being monitoring locations with a subsequent narrative on sampling points. Please clarify that SW-1 and SW-2 are surface water/storm water monitoring points, and that OF-1 and OF-2 are erosion monitoring points to avoid potential confusion over requiring Table D monitoring parameters for all 4 points.	Order Page 7, Item 41 remain as observation points. Changes Accepted: MRP Page 17, D.1, "Monitoring locations, SW-1, and SW-2 are transgradient and downgradient of the SWDS. The downgradient storm water sampling points act as points of compliance for both storm water and surface water. Once the stormwater collection system is completed, the Discharger shall establish an upgradient station location from the SWDS which will act as a background sampling point for both storm water and surface water. The current surface water and storm water monitoring points for the Site are shown in Attachments B. Observation points, OF-1 and OF-2, have been established to monitor potential erosion from closure which includes an engineered alternative which may increase runoff in comparison to a traditional vegetative cover. OF-1 covers the southern runoff area and OF-2 covers the northern runoff area, Observation points OF-1 and OF-2 shall be visually evaluated and monitored for indications of erosion and observation logs shall be included in Table D reporting frequency. Total petroleum as gasoline, diesel, and motor oil shall be monitored for a minimum of one year until proven that these

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			constituents are non-detect or if detected in leachate then it should be only oil and grease. Upon results indicating that these constituents are non-detect below the PQL for a minimum of one year, the Regional Water Board will remove them from annual monitoring. Rainfall shall be measured at the closest weather station to the SWDS.”

**SHN Review Comments**

No.	Order Section	Comments	RWQCB Response to Comments
34	ORDER, Page 2, Item #9	Item #9 makes reference to nine leachate storage tanks. There are 12 leachate storage tanks on the landfill, 9 on the south side and 3 on the north side by the transfer station. All tanks are rated at 2,500-gallon capacity each, for a total of 30,000 gallons of storage.	Duplicate Comment. See Response to Comments #1. Change Previously Accepted.
35	ORDER, Page 5, Item #21	Item #21 makes reference to a culvert at the northern sedimentation pond (SW-2) that discharges to the Little North Fork Gualala River and that the culvert will be replaced during closure construction. Reference is also made to the southern sedimentation pond (SW-1). The culvert at SW-2 discharges to an unnamed tributary to the Little	Duplicate Comment. See Response to Comments #2. Change Previously Accepted.



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Attachment 1 Response to Comments**

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		North Fork Gualala River and the Department has not been working with the Water Board toward a culvert replacement at this location. The Department has been working with the Water Board toward replacing the culvert at the southern sedimentation pond (SW-1) that does discharge to the Little North Fork Gualala River. Please clarify that the culvert at the southern sedimentation pond (SW-1) is to be replaced (as shown in Attachment B).	
36	ORDER, Page 8, Item #42	Well identifiers are different than on Attachment D. Recommend using naming conventions shown on Attachment C (with modifications discussed below). Please add "P-1 has two sampling probes (10 and 19.5 feet), and P-2 has three sampling probes (10, 26, and 52 feet)."	Change Accepted: "Currently the Site has two gas monitoring wells LFGW-1 and LFGW-2 placed during the initial subsurface investigations and three multiple depth gas monitoring wells placed in 2012, P-1, P-2, and P-3. LFGW-1 consists of two probes installed to a depth of 20 feet; LFGW-2 is a single probe installed to a depth of 11 feet and are not currently sampled; P-1 was installed to 20 feet; P-2 was installed to 52 feet; and P-3 was installed to a depth of 21 feet. Only P-1 through P-3 are still sampled. P-1 has two sampling probes (10 and 19.5 feet), and P-2 has three sampling probes (10, 26 and 52 feet). Locations are shown on Attachment C."
37	ORDER, Page 8, Item #45	Item #45 makes reference to a single leachate tank farm, but there are two leachate tank farms at locations shown on Attachments C and D.	Duplicate Comment. See Response to Comments #4; Change Previously Accepted.
38	ORDER, Page 11, Item #62	We are unable to find the code sections referenced in Title 17 and 27.	Change Accepted: "The completed final cover will be periodically tested for damage or defects by monitoring surface emissions pursuant to current

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			regulations Title 17, section 9547(c) and Title 27, section 210090(a)(4)(A)."
39	ORDER, Page 15, Item #11	Would recommend changing the rainfall from 0.1 to 0.5 inches following the installation of the final cover. Also, http address is not working.	Change Accepted: "No later than 24 hours prior to a likely rain event, the Discharger shall ensure erosion controls are functional and effective for all active areas or areas that have not been stabilized. A likely rain event is any weather pattern that is forecast to have a 50% or greater probability of producing 0.5" precipitation event at the Site area. The Discharger shall print and keep for record a copy of precipitation forecast information from the National Weather Service Forecast Office."
40	ORDER, Page 21 Item #24	Change R1-2020-XXX to R1-2021-XXX.	Change Accepted: "Monitoring points and Points of Compliance for groundwater, leachate, and landfill gas shall be as listed in the Monitoring and Reporting Program No. R1-2021-0024 for the Site. Potential leachate seeps, if encountered, shall be sampled in accordance with Monitoring and Reporting Program No. R1-2021-0024."
41	ORDER, Page 29/30, Item #56	Please revise dates for Emergency Response Plan updates.	Change Accepted: "Emergency Response Plans shall be reviewed, updated, and submitted to the Regional Water Board by October 2022, and every five years thereafter."
42	ORDER, Attachment B	Add a 1 to southern leachate tank area.	Change Accepted: "1" was added to the location of the northern leachate tank area.
43	ORDER, Attachment C	Two separate wells labeled P-1 are shown. The "P-1" by the front gate and close to LFGW-1 is actually P-2.	Duplicate Comment. Change Accepted: See Response to Comment #19.

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No.	Order Section	Comments	RWQCB Response to Comments
44	MRP, Page 2, section I, first paragraph	Please consider removing reference to WDRs 75-050 and 93-83. WDR 75-050 does not apply to the South Coast Landfill, and Page 12 of the Order indicates 93-83 is amended to remove the County of Mendocino, South Coast Solid Waste Disposal Site.	Change Accepted: "The Discharger shall report monitoring data and information as required in this MRP and as required in Waste Discharge Requirements Order No. (WDRs) R1-2021-0024."
45	MRP, Page 5, Item 9B	Please consider some rewording to avoid multiple inspections over a one- week period: "The standard observations shall be performed monthly during the rainy season (October through May); quarterly during the dry season (June through September); and no more than once weekly after rainfall events of more than 1.0 inches in 24 hours."	Duplicate Comment. See Response to Comments #22. Change Previously Accepted.
46	MRP, Page 5 Item 9d	Include differential settlement.	Duplicate Comment. See Response to Comments #24. Change Previously Accepted.
47	MRP, Page 6, Table A	Please consider changing dates to August 31 and March 15 (to match reporting for Laytonville Landfill).	Duplicate Comment. See Response to Comments #25. Change Previously Accepted.
48	MRP, page 6, #2 first paragraph and ( c )	Please consider changing each January 15 to March 15- see above comment.	Change Accepted: "An annual report, which summarizes the monitoring results for the prior two semi-annual periods, shall be submitted to the Regional Water Board by March 15, annually. The annual report may be combined with the semi-annual report that is also due March 15."
49	MRP, Page 7 ( e )	Please consider removing the requirement for having the licensed professionals noted prepare the annual visual differential settlement map, or modify to indicate if severe settlement is noted, the licensed professionals noted would prepare the map.	Change Accepted: "If severe settlement is noted (>5 feet) this map shall be made by or under the direction of a California Registered Civil Engineer or Certified Engineering Geologist."
50	MRP, Page 8, Item 5	Please clarify dates for submittal of 5-year iso-settlement map. This item states January 15, 2023, and in the Order Page 19 Item 12 states by January	Change Accepted: "The Discharger shall produce an iso-settlement map and submit it by March 15, 2023 of the Class III waste footprint, and every

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No.	Order Section	Comments	RWQCB Response to Comments
		2027 and Order Page 26, Item 44 states January 31, 2027. If 2023 is the required date, please consider March 15, 2023, to match our proposed reporting date change.	five years thereafter (March 15, 2028, March 15, 2033, March 15, 2038, etc.) until the Executive Officer has determined that differential settlement is unlikely to be of such magnitude as to impair either the unit's containment features (e.g., final cover) or the free drainage of surface flow."
51	MRP, Page 11 II (A)	See comment above—MRP, Page 5, Item 9B.	Change Accepted: "The standard observations shall be performed monthly during the rainy season (October through May); quarterly during the dry season (June through September); and weekly after rainfall events of more than 1.0 inches in 24 hours."
52	MRP, page 12 Item 1 C	Only indicated SW-1 and SW-2, Page 17 D 1 indicates SW-1, SW-2, OF1 and OF2. Please clarify sampling locations. Table C should be D.	Duplicate Comment. See Response to Comments #26. Change Previously Accepted.
53	MRP, Page 12, Item 1d, Page 13 (F), and Page 14 Section B	Reference is made to Gas well P-1. On Attachment C of the WDRs there are two wells labeled as P-1. Well P-1 is referenced many times throughout the document. Gas well P-2 (miss labeled as Gas P-1) has LFGW-1 on one side and LFGW-2 on the other side both within close proximity and no longer used. Well P-2 should be considered adequate for unsaturated zone monitoring on that side of the landfill. LFGW-1 and LFGW-2 are not used anymore, and P-3 should be added.	Duplicate Comment. See Response to Comments #27. Change Previously Accepted.
54	MRP, Page 12, Item 2	Please update 5-year COC monitoring for Fall 2023 and Spring 2028 to match MRP, Page 9, Item 7.	Duplicate Comment. See Response to Comments #29. Change Previously Accepted.
55	MRP Page 12 Item C and MRP,	Leachate sampling mentions the leachate tank farm, there are two leachate tank farms. Which one or both?	Duplicate Comment. See Response to Comments #30. Change Previously Accepted.

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<b>No.</b>	<b>Order Section</b>	<b>Comments</b>	<b>RWQCB Response to Comments</b>
	Page 15, Item C		
56	MRP, Page 13, second paragraph	Please revise; there is only one aquifer beneath south coast landfill.	Change Accepted: "Intra-well statistical data analyses shall be performed for the aquifer due to the lack of appropriate background monitoring capabilities."
57	MRP page 13 ( F ), Page 14 (B)2, and Page 15 Table B	Sampling dates do not match for TO-15 analysis.	Duplicate Comment. See Response to Comments #28. Change Previously Accepted. Change Accepted: Page 15, Table B, "Fall 2022, Spring 2023, and a minimum of every 5 years thereafter as approved by the Executive Officer."
58	MRP, Page 15, Item C.1.b	Unable to locate Table IIIB. Reference is made to leachate sampling frequencies in Table B that is for unsaturated zone detection monitoring.	Duplicate Comment. See Response to Comments #32. Change Previously Accepted.
59	MRP, Page 16/17 Table C	Inorganics are listed twice for five-year analysis.	Change Accepted. Duplicate removed from Table C.
60	MRP, Page 17, Item D.1	Reference is made to SW-1, SW-2, OF-1, and OF-2 being monitoring points with a subsequent narrative on sampling points. OF-1 and OF-2 are not shown on Attachment C.	Change Accepted. OF-1 and OF-2 are shown on Attachment B.
61	MRP, Page 21, Table F	Remove as from bicarbonate/carbonate alkalinity. Remove individual metals Al, B, Cu, Pb, Mo, K as these are included in annual analysis of 26 metals. Recommend removing titanium from the table, as titanium is included in the 26 metals.	Change Accepted. Table F has been amended, clarified and duplicates removed.

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**SWT Consultants Comments**

No.	Order Section	Comments	RWQCB Response to Comments
62	Attachment F	Replacement Figure by SWT Consultants	Change Accepted. Updated Attachment F, replacement accepted.

**Watershed Geo email and ClosureTurf Owners Post-Closure Care Manual, November 2019**

No.	Order Section	Comments	RWQCB Response to Comments
63	ORDER, Page 15, Item 13	Sand infill email chain from Watershed Geo and reference to attached manufacturers 2019 Owners Manual.	Comment previously addressed. Supporting information provided. See Response to Comments #11. Change Previously Accepted.