

**California Regional Water Quality Control Board
San Francisco Bay Region**

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
the Old Pleasanton Landfill
Pleasanton, Alameda County

The Regional Water Board received written comments from EBA Engineering (EBA) submitted on behalf of Pleasanton Garbage Service, Inc. (Pleasanton Garbage Service) on a tentative order distributed for public comment on October 1, 2025. Comments are summarized below in *italics* (paraphrased for brevity) and followed by a staff response. For the full content and context of the comments, refer to the comment letter. To request a copy of the comment letter, please contact Nathan Veale at (510) 622-2336 or Nathan.Veale@waterboards.ca.gov.

Revisions are shown with ~~striketrough~~ for deletions and underline for additions. This document also contains staff-initiated minor editorial and formatting changes.

Comment 1: *EBA requests that we add language to Finding 2 of the tentative order to clarify the ownership and operation of the Landfill.*

Response: We agree. We revised Finding 2 as follows:

Pleasanton Garbage Service Inc. (Discharger) owned and operated the Landfill from 1969, when they purchased it from Mr. Pietronave, until its closure in 1976. The Discharger continues to own the Landfill and retains responsibility for managing and monitoring the Landfill and is responsible for compliance with this Order. Mr. Pietronave owned and operated the Landfill from circa 1950 to 1969.

Comment 2: *EBA requests that we correct a typographical error in Finding 13 of the tentative order.*

Response: We agree. We revised the third sentence of Finding 13 as follows:

At one time the landfill accepted 1,000 gallons per week of water ~~waste~~ softener brine from Rayne Water Condition Company.

Comment 3a: *EBA requests that we remove language from Finding 25 of the tentative order referring to “unsaturated zone” monitoring because the tentative order does not require it.*

Response: We agree. We revised the first sentence of Finding 25 as follows:

In accordance with Title 27, this Order establishes an analytical framework for monitoring groundwater, ~~the unsaturated zone~~, and surface water to detect a release from the WMU.

Comment 3b: *EBA points out that a Corrective Action Program has already been established, as acknowledged in the tentative order. EBA requests that we revise Finding 25 of the tentative order to only require corrective action for “new” releases.*

Response: We disagree. Self-Monitoring Program section B.4.b requires Pleasanton Garbage Service to periodically propose and/or update Concentration Limits. These will then serve as “background levels” for the landfill’s Compliance Points while the landfill is in corrective action. If those concentrations are exceeded, it would be appropriate to follow the steps outlined in Finding 25, regardless of the date of the release.

Comment 4: *EBA requests that Finding 25.h (Retesting Procedures) be revised to apply only to “new” releases.*

Response: We disagree. See response to Comment 3b.

Comment 5: *EBA requests that we remove the requirement in section B.3 of the tentative order to provide and maintain two permanent, surveyed monuments near the Landfill because this requirement is based on Title 27 section 20950(d), which does not prescriptively apply to this landfill. EBA points out that Water Board staff have previously agreed that existing monitoring wells outside the waste footprint suffice for use as permanent survey monuments.*

Response: EBA is correct that Title 27 section 20950(d) does not prescriptively apply to this landfill based on its closure date. However, maintaining surveyed monuments to monitor settlement of the landfill over time is important, and as EBA’s comment acknowledges, Water Board staff have agreed that existing monitoring wells would suffice to fulfill this requirement. As no additional action would be required for Pleasanton Garbage Service, and maintenance of these monuments is important for determining the elevation of wastes over time, we have not removed the requirement.

Comment 6: *EBA requests that we revise the requirement in section B.6 of the tentative order to apply only to “new” structures because the landfill was not required to meet this requirement when it was constructed and it could not possibly satisfy this requirement now that the landfill has been closed.*

Response: We agree. This requirement is based on Title 27 section 20370, which applies to the construction of class III waste management units and does not prescriptively apply to this closed landfill. We revised section B.6 of the tentative order as follows:

The Discharger shall assure that the any new structures that control leachate, surface drainage, erosion, and landfill gas are constructed and maintained to withstand conditions generated during the maximum probable earthquake.

Comment 7: *EBA requests that we extend the deadline in section C.2 (Corrective Action Program Evaluation) of the tentative order to submit a technical report from March 31, 2026, to May 31, 2026, to allow adequate time to collect and analyze samples, and perform the necessary data evaluation.*

Response: We agree. We revised the due date for Requirement C.2 as follows:

COMPLIANCE DATE: ~~March 31, 2026~~ May 31, 2026

Comment 8: *EBA requests that the definition of a significant earthquake be limited to magnitude alone, rather than magnitude and peak ground acceleration. EBA states that including peak ground acceleration would require that a seismic study be conducted to determine if a “Significant Earthquake” had occurred.*

Response: We agree that moment magnitude is sufficient to define a significant earthquake. We revised the definition in footnote 8 to section C.3.c.i of the tentative order as follows:

For the purposes of this Order, a “Significant Earthquake” is a seismic event that: ~~(1) generates ground shaking of moment magnitude 6 or greater within 30 miles of the Landfill; or (2) is capable of generating ground motions exceeding a site peak ground acceleration of 0.15g occurs within 60 miles of the Landfill.~~

Comment 9: *EBA requests that Self-Monitoring Program section B.1.a be revised to replace groundwater elevation in feet above mean sea level with the use of the 1988 North American Vertical Datum (NAVD88) to be consistent with GeoTracker requirements.*

Response: We disagree. We revised Self-Monitoring Program section B.1.a to allow flexibility in the units used and/or datum referenced as follows:

Groundwater Elevation. Whenever samples are collected from a monitoring well at the facility, the Discharger shall determine and log the groundwater elevation ~~in terms of feet below ground surface and mean sea level.~~

Comment 10: *EBA requests that we provide the justification for including chlorinated herbicides and an expanded list of dissolved metals in the self-monitoring program, compounds that were not previously required to be monitored. EBA also acknowledges and does not oppose the addition of PFAS to the list of 5-year constituents of concern (COC).*

Response: We agree that expanding the self-monitoring’s program Five-Year COCs to include chlorinated herbicides and additional dissolved metals is not warranted based on a review of historical groundwater data. Arsenic, copper, and zinc will continue to be monitored more frequently, as specified in the revised Self-Monitoring Program Table B-1 in the Revised Tentative Order (see Response to Comment 12, below). We revised Self-Monitoring Program section B.1.c as follows:

Five-Year COCs. At least once every five years, and alternating between the first and second semiannual events, beginning with the second semiannual sampling event of 2027, groundwater samples shall be further analyzed for the following Constituents of Concern (i.e., Five-Year COCs):

i. ~~Chlorinated Herbicides (USEPA Method 8151)~~

i. Organochlorine Pesticides and PCBs (USEPA Method 8080)

iii. ~~Dissolved Metals (USEPA Methods 6010/7470)~~

ii. PFAS (USEPA Method 1633)^{10 11}

Comment 11: *EBA requests that we correct a typographical error in Self-Monitoring Program section B.2.a of the tentative order.*

Response: We agree. We revised Self-Monitoring Program section B.2.a as follows:

Monitoring Parameters. The Discharger shall conduct surface water monitoring in accordance with Table B-1 (~~see p. 147~~).

We also revised a similar typographical error in Self-Monitoring Program section B.1.b as follows:

Monitoring Parameters. The Discharger shall conduct groundwater detection monitoring in accordance with Table B-1 (~~see p. 15~~).

We also revised a similar typographical error in Self-Monitoring Program section B.2.b as follows:

Five-Year COCs. At least once every five years, and alternating between the first and second semiannual events, beginning with the second semiannual sampling event of 2027, surface water samples shall be further sampled for the Five-Year COCs listed above in section B.1.c ~~B-e~~.

We also corrected the table numbering in the Table Index.

Comment 12: *EBA requests that we provide justification for including ammonia, semi-volatile organic compounds, chromium, iron, cyanide, and sulfide in the self-monitoring program, compounds that were not required to be monitored under previous orders. EBA also requests that certain metals be analyzed as dissolved metals.*

Response: We agree that expanding the self-monitoring program to include these additional parameters is not warranted based on a review of historical groundwater data. We also agree that analyzing arsenic, copper, and zinc as dissolved metals is acceptable. Note that we also revised Table B-1 to remove per- and polyfluoroalkyl substances (PFAS) because Table B-1 is not the appropriate location in the tentative order for 5-year COC monitoring. Self-Monitoring Program section B.1.c lists the required 5-year COCs for monitoring, which includes PFAS. We revised Self-Monitoring Program Table B-1 as follows:

Table B-1. Monitoring Parameters for Groundwater and Surface Water

Monitoring Parameter	Units	USEPA Method	Groundwater (Wells W-1 – W-17A)	Surface Water (Monitoring Points SW-1, SW-2)
Temperature	°F	Field	Semiannually	Semiannually
Depth to Water	Feet above mean-sea level	Field	Quarterly	N/A
Specific Conductance	µmhos/cm	Field	Semiannually	Semiannually
pH	Standard Units	Field	Semiannually	Semiannually
Total Dissolved Solids	mg/L	160.1	Semiannually	Semiannually
Ammonia	mg/L	350.1	Semiannually	Semiannually
Chloride	mg/L	300.0	Semiannually	Semiannually
Nitrate as Nitrogen	mg/L	353.2	Semiannually	Semiannually
VOCs	µg/L	8260B	Semiannually	Semiannually
SVOCs	µg/L	8270	Annually	Annually
Total arsenic, Chromium, Zinc, Iron	mg/L	200.8	Annually	Annually
<u>Dissolved Arsenic, Copper, Zinc</u>	<u>mg/L</u>	<u>6010</u>	<u>Annually</u>	<u>Annually</u>
Cyanide	mg/L	9010	Annually	Annually
Sulfide	mg/L	9030	Annually	Annually
PFAS	ng/L	1633	Five Year COCs	Five Year COCs

Comment 13: EBA requests that the definition of a “Major Storm Event” in the tentative order be revised to account for more site-specific historical data that have been provided to the Regional Water Board.

Response: We agree. We revised Self-Monitoring Program section C.3 as follows:

Major Storm Events. ... For purposes of this provision, a “Major Storm Event” is defined as a storm event greater than the 10-year probabilistic rainfall intensity that results in more than ~~4-inch~~ 2.8 inches of precipitation over a 24-hour period.

Comment 14: *EBA requests that we delete the reference to Iso-Settlement Surveys in the Annual Reporting section of the Self-Monitoring Program because the tentative order does not require Iso-Settlement Surveys.*

Response: We agree. We revised Self-Monitoring Program section D.2.a as follows:

The results of all monitoring required to be conducted on an annual or five-year basis (i.e., Five-Year COCs; ~~Iso-Settlement Surveys~~), and any other information that is required to be reported on an annual basis.