

**From:** "David Meza" <davem@svswa.org>  
**To:** "Dean Thomas" <DThomas@waterboards.ca.gov>  
**Date:** Tue, Dec 18, 2007 1:09 PM  
**Subject:** FW: Johnson Canyon WDR/MRP review

Dean,

Here are some comments from GLA. Feel free to call GLA if you have any questions.

Regarding the CAP and the comments below, September 30, 2008 would be a reasonable deadline with the Financial Analysis for Johnson Canyon due on October 30, 2008.

I am still working on the other questions.

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-----Original Message-----

**From:** John Hower [mailto:jmhower@geo-logic.com]  
**Sent:** Tuesday, December 18, 2007 11:35 AM  
**To:** David Meza  
**Subject:** Johnson Canyon WDR/MRP review

Hi David,

Sarah and I had a few comments, the most significant of which pertains to modifying the leachate sampling protocol. In reviewing the WDR document, since you have already done the EMP/EFS for the site, the CAP/JTD amendment should be relatively straightforward, and I think a six-month time frame is OK from our perspective. Think about your internal contracting for this, and base the time frame on 6 months after award of contract (maybe August 2008 is more realistic?).

John

**JOHNSON CANYON MRP/WDR REVIEW  
COMMENTS FROM GEO-LOGIC ASSOCIATES (GLA):**

Page 4, Section I.E.3., Table 2, Note (a):

Change the reference from Part I.E.2 to Part I.E.4.

Page 4, Part I.E.3., Table 2, Note (d):

GLA would prefer to sample the Amaral well as part of the routine monitoring program. If the Amaral well is to be sampled on contingency, please provide clarification regarding the sampling condition for the Amaral well. The note indicates that the Amaral well would only be sampled if VOCs are detected. Please indicate if the VOC detection that triggers the Amaral sampling would be in a specific well or any well, and explain when the Amaral well would need to be sampled in response to the VOC detection.

Page 6, Part I.E.5.a – Collection System Performance, 2<sup>nd</sup> Paragraph:

The current and proposed leachate sampling protocol is confusing. GLA recommends revising the leachate sampling protocol. As currently understood, the Johnson Canyon Landfill hydrogeology is a relatively simple (i.e., there are not multiple canyons, aquifers, or groundwater flow directions). Generally, discrete leachate samples are collected at sites where hydrogeologic conditions result in a series of separate groundwater monitoring systems (Puente Hills Landfill, which has five discrete canyon landfills, is an example). At JCLF there appears to be a single groundwater flow system. As a result, GLA suggests collection of composite leachate samples. Samples would be collected every year from all leachate collection points. With the exception of VOCs, the samples would be composited in the laboratory, and one "leachate composite" result would be reported. Discrete VOC samples would be collected and reported for each LCRS every year. The COC sample would also be a composite sample, except for the VOC analysis, which would be discrete for each LCRS.

If the RWQCB does not accept composite sampling for leachate, GLA would recommend revising the sampling protocol to collect samples from even-numbered LCRS points on even-numbered years and odd-numbered LCRS points on odd-numbered years.

Page 9, Part III.A – Statistical Analysis.

Just a point to clarify that GLA will continue to use background concentrations limits at the statistical method for this site.

**COMMENTS TO THE DRAFT REVISED WASTE DISCHARGE  
REQUIREMENTS ORDER NO. R3-2008-0011**

Item 24. The reported average concentrations for sulfate and nitrate are switched. The average concentration for sulfate is 22 mg/L and for nitrate is 6.5. The last sentence should be revised to read "...constituent concentrations for chloride, sulfate, nitrate and total dissolved solids are approximately 120, 22, 6.5, and 540 mg/L, respectively."

G. Reporting

There are several numbering issues in this section. The first item is listed as number 4 and should be number 1.

In the Report and Implementation Date Summary, under the Task column the following referenced sections should be modified:

Specification No. C.15 should be B.15  
Specification No. C.16 should be B.15  
Specification No. C.18 should be B.18  
Reporting Requirement F.4 should be E.4  
Reporting Requirement F.5 should be E.5  
Reporting Requirement F.7 should be E.7

The date for the Executive Officer adoption of the order should be modified to the adoption date.