Attachment 3

Comments on WDR Order No. R3-2009-0001

From: "Mike Hoover" <mhoover@chicagogradelandfill.com>
To: "'Dean Thomas'" <DThomas@waterboards.ca.gov>
CC: "'Thea Tryon'" <ttryon@waterboards.ca.gov>
Date: 12/10/2008 3:18 PM
Subject: RE: Thursdays meeting

Dean,

I have several issues, most of them brief:
1. Sediment basin maintenance (this is the largest issue)
2. Depth to gw beneath waste
3. Whether or not the mod 3,4,5 liner construction plan is still approved
4. GW samples from production well (Office) that is not designed for monitoring and potentially has VOC sources (electrical tape, etc)
5. Perchlorate not found in LCRS but is found in upstream stormwater sampling point
6. Storage Facilities mentioned on page 14 of WDRs. What are these and how often is "immediately"?
7. Explain Point of Compliance in geographic terms for me
8. Changing slope seeding to Nov. 1
9. How many landfills in State or in Region 3 are required to do site inspections after every storm event?
10. LCRS testing required if leachate tank is filling after every significant storm?
11. Is 5:1 ration for sludge req'd if sludge is used for vegetative cover?
12. Iron should be filtered before testing in M&RP
13. How do you suggest we determine vertical gradients required by M&RP?

From: "Michael Hoover" mfhoover@hoovergeo.com
To: DThomas@waterboards.ca.gov
Date: 11/14/2008 11:51 AM
Subject: Dean,
Attachments: MW-1.scan.pdf; MW-2.scan.pdf; MW-3.scan.pdf; MW-4.scan.pdf; MW-7.scan.pdf; MW-8.scan.pdf; MW-10.scan.pdf; MW-11,scan.pdf; CGL GW-26 1of2.pdf; CGL GW-2 6 2of2.pdf; Clay Layer.doc; GW Logs 1-10..pdf

Dean,

I have conducted a preliminary review of the Staff Report, the WDRs and the MRP. I will probably have more comments as my outside experts review them, but here are my initial comments:

1. Page 4 of the staff report talks about maintaining capacity in stormwater basins. It is not feasible to maintain liquid capacity in basins in wet years; there is simply no place to put the water in between storms, and if we pump the water to the creek, we would be pumping stormwater almost daily for several months during a wet winter, only to have the next day's storm refill the basin. What would be the point of that? As we see it, if this requirement is taken literally, then the stormwater basins will only overflow when the basins receive storm greater than ½ inch per day and are near capacity before the storm. This is essentially a zero discharge requirement. Hopefully you are referring to removing the silt from the basins in between storms; otherwise we will have to appeal this new requirement at the Board hearing.
2. On that same page of the staff report, Page 4, staff states that groundwater occurs at depths of 35 feet or greater. The number is actually 40 feet as seen on the attached GW-10 well log. It may rise to 35 feet after the boring penetrates the shale since the Monterey Shale is confined aquifer or semi-confined aquifer, but the correct number is 40 feet in the context you have stated it.
3. At the top of Page 4 of the staff report you discuss the Paso Robles Formation. I think the clayey gravel is alluvium or weathered shale, and varies in thickness from 2 feet to 35 feet. It naturally occurs under the entire landfill. The only place where it does not currently underlie the landfill is beneath a portion of Module 2 where we over-excavated for module construction and exposed the shale. We then covered the shale with a compacted low permeability layer made out of this same clay. The clay layer underlies all of module 1 as shown on the attached logs. If there is a cross-section that does not show that, then we can go over that. It may be that the sections do not have enough detail to depict the clay layer at all locations.
4. Referring to page 5 of the staff report, we do not agree that the approval of construction plans and specifications for modules 1 through 5 has been rescinded. We know of no such correspondence that draws that conclusion. What we have done is propose some design modifications for module 4 using GCL and a few other things. We could, however, construct

module 4 as designed, based on a letter from Roger Briggs allowing such construction. Hopefully the design modifications will be approved and this will not be an issue.

I'll try to provide you with more comments as I receive them.