



# SOLID WASTE DEPARTMENT

5955 SOUTH MOONEY BLVD  
VISALIA, CA. 93277  
PHONE (559) 624-7195  
FAX (559) 740-4448

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**BRYCE HOWARD, DIRECTOR**

October 8, 2017

Mr. Dan Carlson, Senior Engineering Geologist  
California Regional Water Quality Control Board  
Central Valley Region  
1685 E Street  
Fresno, CA 93706

**RE: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS,  
WOODLAKE LANDFILL, TULARE COUNTY**

Dear Mr. Carlson,

This letter is in response to the Tentative Waste Discharge Requirements (WDRs) for the Woodlake landfill received by this office dated 21 September 2017. In the accompanying Notice of Public Hearing, it is stated that any comments or recommendations concerning the Tentative WDRs should be submitted to your office in writing by 5:00 pm on 23 October 2017. Staff from the Tulare County Solid Waste Department have reviewed the Tentative WDRs and Monitoring and Reporting Program (MRP), and have the following comments:

**Waste Discharge Requirements:**

**Finding No. 4** lists the documents that are attached to the Tentative Order and incorporated into and made part of the Order however the list of documents does not include the tentative Monitoring and Reporting Program (MRP). Please add the MRP to the list in this Finding

**Monitoring and Reporting Program**

**B. Reporting, B.1 Reporting Schedule**

Page 4 of the MRP reporting schedule indicates that Semiannual reporting for the periods ending 30 June and 31 December are due 1 August and 1 February respectively.

Mr. Dan Carlson  
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Please change the due dates to 31 August and 28 February so as to be consistent with other Tulare County MRPs. Also, please change the dates where they repeat on page 6 of the MRP.

### **B. Reporting, B.2 Reporting Schedule**

Page 5 of the MRP reporting schedule indicates that the Annual Monitoring Report is due 1 February.

Please change the due date to 28 February so as to be consistent with other Tulare County site MRPs. Also, please change the date where it repeats on page 7 of the MRP.

### **Table I**

In the list of Monitoring Parameters, Diesel Range Organics are required as USEPA Method 8015M. This is not a requirement for the current MRP nor is it a requirement contained in any of the other Tulare County landfill MRPs. In addition, the tentative MRP does not have a corresponding table containing a list of required constituents for this method.

Please confirm whether or not this will be a new requirement of the Monitoring Parameters for the Woodlake landfill and, if so, add a list of constituents for this method to the MRP.

The County appreciates the opportunity to comment on the Tentative Waste Discharge Requirements for the Woodlake landfill. If you have any questions or need clarification on any of our comments, please feel free to contact me at (559)624-7197.

Sincerely,



Scott Pfanstiel  
Environmental Coordinator

cc: Joy Isaacson, CalRecycle  
Ken Bowers, Tulare County HHSA – Environmental Health Division.