

Regional Water Quality Control Board  
Central Valley Region

Response to Written Comments for  
Tentative Waste Discharge Requirements  
for  
County of Fresno  
Blue Hills Disposal Facility

This document contains the responses to written comments received from interested parties regarding the proposed tentative Waste Discharge Requirements (WDRs) for the County of Fresno (County), Blue Hills Disposal Facility, Fresno County for post-closure maintenance. The Tentative WDRs, R5-2021-XXXX, were updated as part of a policy of administrative review. Currently, the Facility is currently regulated by Waste Discharge Requirements Order 99-087.

The Tentative WDRs were circulated on 20 April 2021 for public comment, ending on 20 May 2021. A total of one letter/email was received and these comments are addressed below.

Comments submitted during the comment period were received from the following:

- A. County of Fresno, 5 May 2021

## RESPONSE TO COMMENTS

### Comment 1:

Finding 1: The County of Fresno (Discharger) owns and maintains the Blue Hills Disposal Facility (Facility), which is located approximately 9 miles northeast of the City of Coalinga in Fresno County, in the SE ¼ of the NE ¼ of Section 3, Township 19 South, Range 15 East, Mount Diablo Base and Meridian (MDB&M). The Facility is within the Coalinga Oil Field as they are defined by the California Geologic Energy Management Division (CalGEM), formerly known as the Division of Oil, Gas, and Geothermal Resources (DOGGR). The Facility's location is depicted on the Site Location Map in **Attachment A**.

**Comment: Line 5** – Please change “they are” to “it is”

### Response 1:

The recommended revision will be made.

### Comment 2:

Finding 16: The geologic material immediately underlying the WMUs does not meet the Chapter 15 prescriptive permeability criterion for Class I units. (See Title 23, § 2531, subd. (b)(1).) The WMUs also lack a liner system. (See *id.*, § 2542.) Therefore, Order 90-254 classified the WMUs as “existing” Class III WMUs containing hazardous waste.

**Comment: Line 1** Please change “The geologic material immediately underlying...” to “The geologic material, known as the Etchegoin Formation, immediately underlying...”

**Response 2:** The recommended revision will be made.

**Comment 3:**

Finding 22: According to the Central Valley Water Board’s *Water Quality Control Plan for the Tulare Lake Basin* (Basin Plan), the designated beneficial uses of surface waters of the Juniper Hydrologic Area include: agricultural supply (AGR); industrial service supply (IND); industrial process supply (PRO); water contact recreation (REC-1); non-water contact recreation (REC-2); warm freshwater habitat (WARM); wildlife habitat (WILD); rare, threatened, or endangered species (RARE); and ground water recharge (GWR).

**Comment: Line 3** Please add the word “Ridge” following “Juniper”

**Response 3:** The recommended revision will be made.

**Comment 4:**

Finding 26: The background perched groundwater is poor quality, and according to the criteria contained in the Basin Plan, meets the criteria for consideration of an exemption from the MUN beneficial use designation. Naturally occurring organic hydrocarbons have been detected in monitoring well No. E-01 A. The concentrations of total dissolved solids (TDS) range from 2,500 to greater than 11,000 mg/l. Electrical Conductance of the groundwater ranges from 2,800 to 8,500 µmhos/cm. Elevated concentrations of sulfates, which range from 1,300 to 9,000 mg/l, also contribute to poor background water quality.

**Comment: Line 4** Please change :”well No. E-01 A” to “wells E-1A and E-6” to update and present consistent well designations as shown in Finding 33 on page 6.

**Response 4:**

The recommended revision will be made.

**Comment 5:**

Finding 33: The Etchegoin Formation is known to have crude oil bearing zones within the Coalinga oil field. During groundwater sampling, field notes from Facility groundwater monitoring well network well have noted the presence of hydrogen sulfide (H<sub>2</sub>S) odors and crude oil. Specifically wells E-1A and E-6 were abandoned because of

crude oil entering their well screens at depths of 82-112 feet and 136-201 feet, respectively. H2S odors have been noted from wells E-1A, E-7, E-9, E-10, and B-207.

**Comment: Line 3** Please change “well network well” to “well network wells”

**Response 5:** The recommended revision will be made.

**Comment 6:**

Finding 38: Historically, localized groundwater degradation had occurred within the northeast area of the site in the vicinity of monitoring well E-03. The herbicide dicamba had been detected in groundwater samples collected from monitoring well E-3. Mecoprop (MCPP) has also been found in samples collected from groundwater monitoring well E-3 and sporadically in samples from well B-204B. Other chlorophenyl herbicides and chlorinated pesticides have occasionally been detected at low concentrations in monitoring wells. The last detections of dicamba and MCPP in well E-3 were in April 2016; and the last detection of MCPP from well B-204B was in October 2015. Neither MCPP nor Dicamba have a federal or California MCL.

**Comment: Line 2** Please change “well E-03” to “well E-3” to be consistent.

**Response 6:**

The recommended revision will be made.

**Comment 7:**

Finding 39: Historically, the corrective action program for groundwater at the Facility consisted of bioremediation, which utilized an oxygen-releasing compound in monitoring well E-03. The Facility is currently using monitored natural attenuation as their form of corrective action.

**Comment: Line 3** Please change “well E-03” to “well E-3”

**Response 7:**

The recommended revision will be made.

**Comment 8:**

**INFORMATION SHEET: PAGE 1 second paragraph, last line:** “the non-hazardous portion of WMU 3. These wastes are classified as non-hazardous.”

**Comment:** Please change the last line to: “the non-hazardous portion of WMU 3, designated WMU-3NH. These wastes are classified as non-hazardous.”

**Response 8:**

The recommended revision will be made.