June 19, 2013 Item No. 5 Supporting Document No. 3

Grove, Amy@Waterboards

From:	Mohr, Neil <nmohr@republicservices.com></nmohr@republicservices.com>
Sent:	Tuesday, April 16, 2013 1:49 PM
То:	Odermatt, John@Waterboards; Gardner, Tom
Cc:	Grove, Amy@Waterboards; Len.yamamoto@shawgrp.com; Mr. Bill Prinz
Subject:	RE: Tentative Addendum 2 to Order 99-74: Sycamore Landfill Expansion
Attachments:	sycamore_addendum.pdf

(Oops, this one contains the memo) John,

Thanks for you and your staffs efforts on the Tentative Addendum 2 to Order 99-74 for Sycamore Landfill. As you know we are prepared to begin work on the Stage's liner system. We have attached a memo with our requested clarifications/changes to the Order. If you or Amy have any questions, please call Len Yamamoto at 619/533-7322 or me at 619/733-7525.

Neil R Mohr

General Manager | Republic Services 619.449.9026 office | 619.733.7525 cell | 619.449.1050 fax Sycamore Landfill Office | 8514 Mast Boulevard | Santee, CA 92071

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From: Odermatt, John@Waterboards [mailto:John.Odermatt@waterboards.ca.gov]
Sent: Monday, April 08, 2013 11:17 AM
To: Gardner, Tom
Cc: Grove, Amy@Waterboards; Len.yamamoto@shawgrp.com; Mohr, Neil; Mr. Bill Prinz
Subject: Tentative Addendum 2 to Order 99-74: Sycamore Landfill Expansion

Tom,

Attached is a pdf with the tentative Addendum No. 2 to Order 99-74 for Sycamore Landfill. This addendum, if adopted, would prescribe requirements for the expansion of Sycamore Landfill by including construction of Stage III-A. As indicated in the cover letter/notice, written comments on the tentative Addendum are due to the San Diego Water Board by <u>May 8, 2013</u>, and we anticipate scheduling this item for consideration by our Board members at their monthly meeting <u>on June 19, 2013</u>.

Unless we have a reason to schedule a hearing, we are hoping to put this item on the Consent Calendar for consideration by our Board members. Please contact Ms. Amy Grove (<u>agrove@waterboards.ca.gov</u> or TEL: 858-637-7136) if you have any questions. John

Regards,

John R. Odermatt, M.Sc., PG Senior Engineering Geologist Cleanup and Land Discharge Branch California Regional Water Quality Control Board - San Diego Region 9174 Sky Park Court, Suite 100 San Diego, CA 92123 TEL: 858-637-5595 We have the following comments/questions on the Tentative Addendum:

- The design specifications call for a 16 oz geotextile as described in the tentative addendum. However, one supplier that is being considered cannot meet the required physical properties specified and will have to supply 18 oz material. Therefore, we request that the words "minimum nominal" be added before "16 ounce" in the table on page 5
- 2. On page 6, paragraph 2.b., it states, "On the sideslopes, this layer serves as the draining layer of the sideslope LCRS and shall be placed 8 to 10 feet vertically up the sideslopes," We request that, "serves as the draining layer of the sideslope LCRS and" be removed. Because of the slope, the preferential leachate flow on the side slopes will be the interface between the protective soil cover and waste fill. There is no need to define a minimum permeability for the side slopes.
- 3. On page 6, paragraph 2.c., the requirements for the protective soil layer include the following: "Be comprised of gravels, sands, clays, and /or silts and have a minimum average permeability of at least 1x10-4 cm/sec, but in no case shall the protective soil layer have a permeability of 1x10-5 cm/sec or less."

This permeability requirement is different from the San Diego Water Board's comment received by email on March 12, 2013 that stated, "At a minimum, the design specifications for PCS/Operations in future WDRs issued by the San Diego Water Board will require an average permeability of greater than 1x10-5 cm/sec, and dischargers should plan/design future landfill expansion Units accordingly."

Assuming that the requirement is a minimum average permeability of 1x10-4 cm/sec with no permeability value greater than 1x10-5 cm/sec, we request that paragraph 2.c.iii. be changed to the following:

"Be comprised of gravel, sands, clays and/or silts. The Basal Composite Liner System (BCLS) protective soil cover shall have a minimum average permeability of 1X10-4 cm/sec. In order to demonstrate compliance with this requirement, the discharger may calculate an effective permeability (weighted average based on area) of the protective soil cover if the discharger can demonstrate that specific measureable areas of the protective soil cover are composed of different permeabilities. The calculated effective permeability shall be a minimum of 1x10-4 cm/sec. In no case shall the protective soil layer have a permeability of less than 1x10-5 cm/sec."