



County of San Diego

DEPARTMENT OF PUBLIC WORKS

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25 July 2007

Ms. Carol Tamaki
Water Resources Control Engineer
California Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, California 92123

BOARD MEETING AUGUST 8, 2007, AGENDA ITEM #5 - TENTATIVE ADDENDUM NO. 6 TO ORDER NO. 97-11: GENERAL WASTE DISCHARGE REQUIREMENTS FOR POST-CLOSURE MAINTENANCE OF INACTIVE NON-HAZARDOUS WASTE LANDFILLS WITHIN THE SAN DIEGO REGION (ALPINE II BURN DUMP)

Ref: LDU:06-139:ctamaki

Dear Ms. Tamaki:

The County of San Diego, Department of Public Works, Landfill Management (the County) hereby acknowledges receipt of the letter on behalf of the California Regional Water Quality Control Board – San Diego Region (Regional Board), as referenced above. The County greatly appreciates the Regional Board's efforts in preparing Addendum No. 6 to Order 97-11 for the Alpine II Burn dump. This Addendum will allow the County to implement its plan to consolidate the burn dump waste onto County property and clean close two adjacent properties.

Upon reviewing the tentative Addendum No. 6 to Order No. 97-11, the County offers the following comments on three specific sections of the Addendum, as given below:

I. "3. The Discharger shall comply with all post-closure maintenance, monitoring, and reporting requirements of Order 97-11, and addenda thereto, for the Alpine 2 Burn Dump."

The draft Technical Report states that burn ash waste does not generally pose a threat to ground water and that the County is exempted from complying with groundwater monitoring requirements of Monitoring and Reporting Program No. 97-11. The County requests that Section 3 of Addendum No. 6 be revised to clearly state the exemption as follows:

"3. The Discharger shall comply with all post-closure maintenance, monitoring, and reporting requirements of Order 97-11, and addenda thereto, for the Alpine 2 Burn Dump. However, the County is exempted from complying with groundwater monitoring requirements of the Monitoring and Reporting Program."

II. "C.18. Consolidation of Burn-ash Wastes at the Alpine 2 Burn Dump

- a. Burn ash wastes shall be placed within the consolidation area to a height of approximately 1 to 10 feet above existing grade.*
- b. The consolidated burn debris cap shall be compacted to a minimum relative compaction of 90%. Moisture content of burn-ash wastes during placement should be between 0 and 3% above optimum moisture content. Compaction test results shall be documented by field personnel and attached to Daily Field Reports."*

The County agrees with the spirit of adding this maintenance specification to Addendum No. 6. However, as they currently appear in the tentative Addendum, the maintenance specifications reflect the conceptual grading plan presented in the "Corrective Action Work Plan" [County, 2006] and not the final grading and compaction requirements to be specified during final design. In consideration that the conceptual grading plan may be modified before the corrective action is started, the County hereby requests that this section be revised to:

"C.18. Consolidation of Burn-ash Wastes at the Alpine 2 Burn Dump

- a. Burn ash wastes shall be placed within the consolidation area and compacted in general accordance with the Corrective Action Work Plan, the final project construction drawings, and technical specifications.*

III. "E.13. Construction Quality Assurance (CQA) Report for the Alpine 2 Burn Dump

The Discharger shall provide the Regional Board with a final Construction Quality Assurance (CQA) Report, including information required in California Code of Regulations Title 27, §20324(d)"

Typically, a CQA Report is prepared by a Registered Professional Engineer to document that the construction of a project, such as an earthwork construction project, is completed in general accordance with plans and specifications. Similarly, a Closure Report is prepared by an experienced environmental professional to document that the clean closure of a site is performed in accordance with a corrective action or remedial action work plan. In tentative Addendum No. 6, the RWQCB outlines a Reporting Requirement for the County to submit a comprehensive report that includes both CQA and Closure documentation.

In lieu of one comprehensive report, the County would like the option to prepare two separate reports to fulfill this requirement. One report will address the CQA components of the

Ms. Carol Tamaki
25 July 2007
Page 3

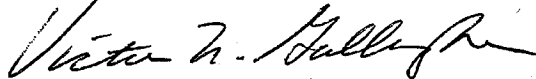
consolidation project, and include such documentation as soil compaction test results, daily summary reports, materials acceptance reports, and final as-built grading plans. The second report will address the clean closure components of the project, and include documentation on confirmation sampling locations, laboratory analytical data, interpretation of data, and written technical evaluations. The option to prepare separate reports for CQA and Closure will allow the County greater flexibility in documenting and fulfilling their reporting requirements for each of those distinct components of the project.

The County is happy to have the support of the Regional Board in our plan to consolidate and cover the Alpine II Burnsite. We appreciate your efforts, and look forward to attending the meeting on 8 August to provide testimony in support of the revised Tentative Order.

Please call Ed Zielanski, Civil Engineer, at (858) 495-5475 or me at (858) 495-5445 with any questions regarding the County's comments. Additional correspondence on this matter, if necessary, may be directed to my attention at 5201 Ruffin Road, Suite D MS 0383, San Diego, California 92123.

Thank you for your attention to this issue.

Sincerely,



Victoria L. Gallagher, REHS, MPH
LUEG Program Manager
Landfill Management

cc: Bob Morris, RWQCB
Rebecca Lafreniere, DEH/LEA
Rich Crompton, DPW
Ed Zielanski, DPW