

Item Number 6

Supporting Document 5

Response to Public Comments

February 10, 2021

Responses to Public Comments

Comments Received from Mr. John Odermatt, private citizen, November 23, 2020			
No.	Comment	San Diego Water Board Response	Action Taken
1	“Will the 60-mil single textured side HDPE be installed with textured side down? If so, how do we know that?”	The August 2020, Final Corrective Action Plan (CAP) describes the new engineered alternative Phase I waste management unit (unit) side slope liner system, which specifies that the 60-mil, single-sided textured High Density Poly Ethylene (HDPE) geomembrane will be placed directly above the geosynthetic clay layer, with the textured side down. This specification is also included in the approved Construction Quality Assurance (CQA) Plan, which requires documentation of all construction activities through the submittal of daily field reports and the CQA Report, after construction activities are completed. The CQA Report will include descriptions and photographic demonstrations that all components of the liner system were installed in accordance with the CAP.	No changes to Tentative Addendum No. 2 are needed based on this comment.
2	“Past groundwater seeps seemed to include elevated concentrations of uranium (circa 2005). Is the USMC prepared to manage that waste in accordance with NCR requirements like last time?”	<p>In 2005, leachate seeps from the Phase I unit contained concentrations of Tritium, a radioactive hydrogen atom. In response to this comment, the United State Marine Corp (USMC) provided that, <i>“Yes, MCB Camp Pendleton is prepared to manage radioactive liquids in accordance with Federal and applicable state regulations, should they be encountered during corrective actions.</i></p> <p><i>Quarterly, the MCB Camp Pendleton tests the landfill leachate for Gross Alpha and Beta radiation as well as for Radium 228 and 226. There is also a current approved process for disposal of leachate from Las</i></p>	No changes to Tentative Addendum No. 2 are needed based on this comment.

		<p><i>Pulgas Landfill to the Northern Region Tertiary Treatment Plant located on MCB Camp Pendleton. The process includes the submittal of a Request-to-Discharge Form and associated lab data for review/approval by the MCB Camp Pendleton Wastewater Source Control Group. Additional Leachate Collection and Removal procedures are included in the Landfill Management Plan (Sept 2020)."</i></p> <p>A copy of the email exchange is provided as Attachment No. 1 to Supporting Document 3.</p>	
3	<p>"Will the liner be tested with electric leak detection technology on the side slope?"</p>	<p>The criteria for completing an electronic leak detection survey after liner construction can be found in Order No. R9-2010-0004 as amended by Order No. R9-2011-0039, <i>Waste Discharge Requirements for the United States Marine Corps, Marine Corps Base Camp Pendleton, Las Pulgas Landfill, Camp Pendleton, California (Order No. R9-2010-0004)</i>, section E.7.c - <i>Landfill Construction Specifications</i>.</p>	<p>No changes to Tentative Addendum No. 2 are needed based on this comment.</p>
4	<p>"Was a slope stability analysis conducted for the new side slope liner system? What were the results of the pseudo static analysis and what criteria were used to determine compliance?"</p>	<p>A design and slope stability analysis were performed on the proposed engineered alternative side slope liner system. San Diego Water Board staff provided extensive comments to the analysis to ensure compliance with applicable State and federal requirements related to design criteria and slope stability. The criteria applied to the slope stability analysis is consistent with the strength parameters, modeling criteria, and conservative approaches applied at other active landfills in the San Diego Region. A copy of the final CAP, which details the parameters and assumptions used in the analysis as</p>	<p>No changes to Tentative Addendum No. 2 are needed based on this comment.</p>

		well as the results, can be found in the State's GeoTracker database. ¹	
5	"What will be the course of action if the delivered liner materials do not meet the design specifications?"	Tentative Addendum No. 2, section K.5 - <i>Landfill Materials Conformance Testing</i> requires the USMC to conduct confirmation testing on liner materials imported for the CAP, prior to the start of construction activities. If after testing it is determined that the material strengths of imported liner materials are less than the material strengths used in the design and slope stability analysis, the USMC is required to complete a new slope stability analysis and submit the results to the San Diego Water Board for review and comment prior to deployment of liner materials on the side slopes of the Phase I unit.	No changes to Tentative Addendum No. 2 are needed based on this comment.

Comments Received from the United States Marine Corps, December 29, 2020

No.	Comment	San Diego Water Board Response	Action Taken
1	In paragraph A.2, we suspect "R9-2010-004" should state "R9-2010-0004."	The San Diego Water Board will revise Tentative Addendum No. 2 to correct the reference order number.	Tentative Addendum No. 2 has been amended
2	In paragraph K.1.c, K.1.e, and K.7.b, please replace "60-millimeter" with "60-mil thick."	A "mil" is a unit of measurement equivalent to 1/1000 th of an inch and is not an abbreviation for a millimeter. The addendum will be revised to make this correction.	Tentative Addendum No. 2 has been amended
3	In paragraph K.4, please replace "300 millimeter" with "300-mil."	A "mil" is a unit of measurement equivalent to 1/1000 th of an inch and is not an abbreviation for a millimeter. Tentative Addendum No. 2 will be revised to make this correction.	Tentative Addendum No. 2 has been amended
4	In paragraph K.5.b, we recommend replacing the proposed language with, "If the material strength	The USMC has the option of rejecting the materials and ordering replacement materials that meet the original design specifications and material strengths	Tentative Addendum No. 2 has been amended

¹ The Final Corrective Action Plan, dated August 28, 2020 can be reviewed using this link:
https://documents.geotracker.waterboards.ca.gov/esi/uploads/geo_report/4211147606/L10009449664.PDF

	<p>parameters measured during conformance testing are less than the strength parameters used in the Phase I unit side slope design and stability analysis, the Discharger must reject the materials and have them replaced with conforming materials.”</p>	<p>rather than re-running the slope stability analysis. Conformance testing is still required after receipt of these materials and prior to the start of construction. Tentative Addendum No. 2 will be revised to provide the USMC with both options if the materials proposed for use in the Phase I unit side slope liner system do not meet the project specifications and design criteria.</p>	
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