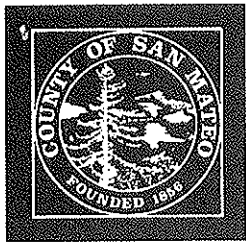


Department of Public Works



COUNTY OF SAN MATEO

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NOV 9 2006

QUALITY CONTROL BOARD

November 22, 2006

Mr. Cecilio Felix
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Mr. Felix:

Re: Tentative Order for Updated Waste Discharge Requirements – Pescadero Solid Waste Disposal Site, Pescadero, San Mateo County

Thank you for the opportunity to review the Tentative Order. Per our telephone conversation on November 15, 2006, I understand that written comments are acceptable if we submit them to you by November 22, 2006.

The following comments refer to the Tentative Order:

Discharger and Location

Page 1, Item 2 – Landfill location and description: Revise the 4th sentence of the paragraph to “The newer portion of the landfill is undeveloped; adjacent to the newer portion is a transfer station operated by Allied Waste (formerly Browning Ferris Industries)”.

Site Description

Page 2, Item 7 – Landfill Cap: Revise the 7th sentence of the paragraph to “A prescriptive engineered cap consistent with Title 27 includes ...”.

Site Geologic and Hydrogeologic Setting

Page 3, Item 10 – Surface Water: Revise the 2nd sentence of the paragraph to “The older portion of the landfill is located at near the mouth of the valley ...”.

Site contamination and Water Quality

Page 4, Item 13 – Contamination originating at landfill: Revise the 2nd sentence of the paragraph to “Groundwater monitoring at the newer portion of the landfill has been conducted ...”.

Mr. Cecilio Felix, Regional Water Quality Control Board, San Francisco Bay Region

Re: Tentative Order for Updated Waste Discharge Requirements – Pescadero Solid Waste Disposal Site, Pescadero, San Mateo County

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Basin Plan

Page 4, Item 15: Does the Water Quality Plan for the San Francisco Bay Basin (Basin Plan) adopted on January 21, 2004 include the coastal areas such as the Pescadero Landfill? If it does not, this section should be deleted.

B. Specifications

Page 8, Item 8 – Please clarify the term “reasonable”. We believe the installation of additional monitoring devices should be “agreeable” to both the Regional Board and the County of San Mateo.

Page 8, Item 11 – We believe the requirement of a minimum of 2 surveyed permanent monuments to be installed is not necessary due to the size of the landfill. We have been able to monitor the elevation of wastes and other facilities using the top of the existing monitoring well covers. Please delete.

C. Provisions

Page 10, Item 4 – Results of Groundwater Sampling: We would like the compliance date revised from August 1, 2007 to August 1, 2008 to account for the lengthy process of obtaining a Coastal Development Permit (CDP) for work done within the Coastal Zone.

Page 10, Item 5 – Final Cover Construction Plans: For the same reason stated in Item 4 above, we would like the compliance date changed from April 1, 2007 to April 1, 2008. Accordingly, the date for the final cover installation should be changed from January 30, 2008 to January 31, 2010 (please note year is different from the date stated in my e-mail dated November 16, 2006 to allow 2 construction seasons for implementation).

Page 10, Item 6 – Final Cover Construction Certification Letter (CCL) and Construction Quality Assurance Report (CQA) Compliance Date: Revise 30 days to 90 days to be consistent with Item 16 on page 13.

Page 11, Item 7 – Post-Earthquake Inspection and Corrective Action Reports:

- a) The compliance date is stated as within 72 hours of the occurrence of an earthquake of magnitude 6 or higher. Due to the remote location of the landfill site, access to it may become difficult if the major routes to the coastal areas, mainly State Routes 84 and 92, sustain any damage and had to be closed. Please revise to allow flexibility.
- b) Revise the 1st sentence of the paragraph to “The Discharger shall submit a technical report ... for any earthquake greater than Richter Magnitude 6 ~~or greater~~ at or within 30 miles of the landfill”.

Page 12, Item 10 – Annual Maintenance Report Compliance Date: Revise the month from July to January to be consistent with the submittal date of the Annual Report.

Page 13, Item 13 – Stormwater Control Plans: Not applicable. Please delete.

Mr. Cecilio Felix, Regional Water Quality Control Board, San Francisco Bay Region

Re: Tentative Order for Updated Waste Discharge Requirements – Pescadero Solid Waste Disposal Site, Pescadero, San Mateo County

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Page 3

Page 13, Item 14: Revise sentence to “The Discharger shall maintain a copy of these waste discharge requirements and these requirements shall be available to operating personnel ~~at the facility~~ at all times [CWC Section 13263]”.

Page 14, Item 18: See comment regarding Basin Plan. Is the term “Self Monitoring Plan” referring to Attachment A “Discharge Monitoring Program”?

Page 14, Item 19: Does the Report of Waste Discharge apply to the Pescadero Landfill? If not, please delete.

The following comments refer to Attachment A, Part A:

C. Definition of Terms

Page 18, Item 2: We do not believe that the San Francisco Bay can be considered as receiving water from this site.

Page 19, Item 3a – Receiving Waters: Does this refer to areas within the landfill only (i.e. ponding, ditches)?

Page 19, Item 3c – The waste management unit: This site does not have a silt basin. Therefore, please delete silt basin capacity from number 5 of Item 3c.

F. Reports to be Filed with the Board

Item 1 – Monitoring Reports:

- a. Page 20: Revise 1st sentence of paragraph to “Written ~~detection~~ monitoring reports shall be ...”.
- b. Page 21, Item b-1: Revise sentence to “A graphic description of the ~~velocity and~~ direction of groundwater flow ...”.
- c. Page 22, Item h: Not applicable. Please delete.
- d. Page 22, Item i: Not applicable. Please delete.
- e. Page 22 Item j: Not applicable. Please delete.

Page 23, Item 2b – Contingency Reporting: Figure 2 is not found in the document.

G. Water Quality Protection Standards

Page 24, Item 1 – Constituents of Concern: Is the term “Self Monitoring Program” referring to Attachment A “Discharge Monitoring Program”?

Mr. Cecilio Felix, Regional Water Quality Control Board, San Francisco Bay Region

Re: Tentative Order for Updated Waste Discharge Requirements – Pescadero Solid Waste Disposal Site, Pescadero, San Mateo County

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Page 4

Page 24, Item 2 – Concentration Limits:

- a. Revise 4th sentence of paragraph to “and 3) periodically detected in some wells ... of corrective measures or as a result of the presence ...”.
- b. The last sentence of paragraph refers to the concentration limits for Corindas Los Trancos Creek. Is this correct?

Page 24, Item 3 – Monitoring Points:

- a. Is the term “Self Monitoring Program” referring to Attachment A “Discharge Monitoring Program”?
- b. The last sentence of paragraph mentions corrective measures. Please clarify.

Page 24, Item 4 – Point of Compliance: Can this be defined on a map or this is apply to this site?

The following comments refer to Attachment A, Part B:

Page 25, Item A – Groundwater, Leachate, and Stormwater Monitoring: Is Figure 1 supposed to be Figure A-1?

Page 25, Item B – Facilities Monitoring:

- a. Revise 1st sentence of paragraph to “The Discharger shall inspect all facilities to ensure proper and safe operation ~~once per quarter~~ semi-annually and report semi-annually”.
- b. Item 4 refers to re-use areas. Does this apply to this site?

Page 25, Item D – Photo Documentation of Facilities Monitoring: This should be Item C. Part B.1.C referred to in this paragraph and does not exist.

Page 25, Item E – On-Site Observations: This is similar to Item B. Please delete.

Page 26, Item F. – Seepage Monitoring: This item does not apply. Please delete.

The following comments refer to Tables 1 and 3:

Page 28, Table 1 – Groundwater Monitoring Points, Parameters and Sampling Frequency Pescadero Landfill: Delete “And Drains” from the Column 1. This site does not have accessible drains.

Page 31, Table 3 – Leachate and Seepage Monitoring Points, Parameters and Sampling Frequency – Pescadero Landfill: Not applicable. Please delete.

Mr. Cecilio Felix, Regional Water Quality Control Board, San Francisco Bay Region

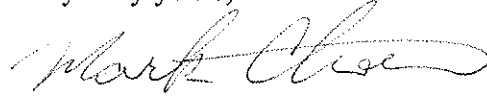
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Please call me at (650) 599-1489 with any questions you may have about our comments on the Tentative Order.

Very truly yours,



Mark Chow, P.E.
Senior Civil Engineer
Utilities-Flood Control-Watershed Protection

MC:mc

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F-246 (4)

Enclosures: None

cc: Neil R. Cullen, Director of Public Works
Brian C. Lee, P.E., Deputy Director, Engineering & Resource Protection
Joe La Mariana, Waste and Environmental Services Manager
Ann Stillman, Principal Civil Engineer, Utilities-Flood Control-Watershed Protection