

**California Regional Water Quality Control Board
San Francisco Bay Region**

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
Bedwell Bayfront Park Landfill
Menlo Park, San Mateo County

The Regional Water Board received written comments from the City of Menlo Park on a tentative order distributed for public comment on April 30, 2026. Comments are summarized below in *italics* (paraphrased for brevity) and followed by a staff response. For the full content and context of the comments, refer to the comment letter. To request a copy of the comment letter, please contact Nathan Lopez-Veale at (510) 622-2336 or Nathan.Veale@waterboards.ca.gov.

Revisions are shown with ~~striketrough~~ for deletions and underline for additions. This document also contains staff-initiated revisions in addition to those arising from the response to comments.

CITY OF MENLO PARK

Comment 1: *The City points out that the required monitoring frequency for depth to water measurements of leachate is quarterly, whereas the monitoring frequency for all other leachate monitoring parameters is annual, and asks if this is an error.*

Response: We revised the tentative order in response to the City's comment to make clarifications and corrections to the detection monitoring program.

We revised the tentative order to reduce the depth to water monitoring frequency for leachate and groundwater from quarterly to semiannually to be consistent with requirements at other similar landfills in our Region. This change is also consistent with Attachment B, section B.1.a, which requires that groundwater elevation be determined and logged whenever samples are collected from a monitoring well at the facility.

We also revised the tentative order to clarify the monitoring points for leachate depth to water measurements. We removed the requirement to sample depth to water at leachate monitoring point S-1 because it is a sanitary sewer manhole and therefore not an appropriate monitoring point to measure leachate levels in the landfill. In accordance with the previous Waste Discharge Requirements, leachate levels are measured in several wells and piezometers across the landfill that were not specified in the tentative order. We revised the tentative order to include the appropriate list of monitoring points for leachate depth to water measurements to be consistent with the previous Waste Discharge Requirements. The monitoring points and monitoring frequency required for leachate depth to water measurements are listed in a new section B.2 added to Attachment B of the Revised Tentative Order.

We revised Attachment B, section B (Detection Monitoring Program) of the tentative order to make the corrections described above, as follows:

Detection Monitoring Program

:

2. Leachate

- a. **Leachate Elevation.** The Discharger shall conduct leachate level monitoring in wells GR-1, GR-3, GR-6, GR-7, GR-8, P-1, P-2, P3, and P-4 on a semiannual basis.
- b. **Monitoring Parameters.** The Discharger shall conduct leachate detection monitoring in accordance with Table B-1.

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4. Analyte Table

Table B-1. Monitoring Parameters for Groundwater, Leachate, and Surface Water.

Monitoring Parameter	Units	USEPA Method	Groundwater (Wells G-2 – G-8)	Leachate (Monitoring Point S-1)	Surface Water (Monitoring Points SW-1, SW-2)
⋮	⋮	⋮	⋮	⋮	⋮
Depth to Water	Feet	Field	Quarterly <u>Semiannually</u>	Quarterly [1]	N/A
⋮	⋮	⋮	⋮	⋮	⋮

Note:

[1] Leachate level monitoring requirements are specified in Attachment B, section B.2.a, above.
Leachate level monitoring is not required at well S-1 because it is a sanitary sewer discharge point that is not representative of leachate levels in the landfill.

We also revised Finding 25 of the tentative order to clarify that the monitoring program includes leachate monitoring, as follows:

- 25. In accordance with Title 27, this Order establishes an analytical framework for monitoring groundwater, leachate, and surface water to detect a release from the WMU. ...

Comment 2: *The City requests that we change the requirement to conduct the first Five-Year Constituents of Concern (COCs) surface water sampling event from 2027 to 2031 to align with its current schedule; the City just conducted its Five-Year COCs sampling event in 2026.*

Response: We agree. We revised Attachment B, section B.3.b of the tentative order as follows:

Five-Year COCs. At least once every five years, and alternating between the first and second semiannual events, beginning with the second semiannual sampling event of ~~2027~~ 2031, surface water samples shall be further sampled for the Five-Year COCs listed above in section [B.1.c](#).