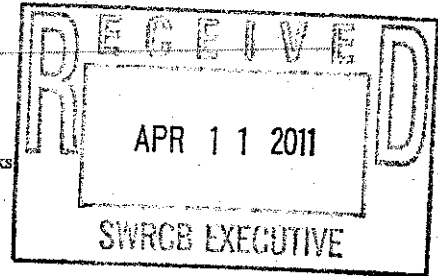


commentletters - Comment Letter - Draft Industrial General Permit

From: "Danza, Nina" <Ndanza@cosbpw.net>  
To: "commentletters@waterboards.ca.gov" <commentletters@waterboards.ca.gov>  
Date: Monday, April 11, 2011 10:53 AM  
Subject: Comment Letter - Draft Industrial General Permit  
CC: "Cragin, Imelda" <Icragin@cosbpw.net>

TO: Jeanine Townsend, Clerk to the Board, State Water Resources Control Board  
FROM: Nina Danza, Resource Recovery & Waste Management Division, Santa Barbara County Department of Public Works  
RE: Comment Letter - Draft Industrial General Permit



The Santa Barbara County Resource Recovery & Waste Management Division (RRWMD) owns and operates Tajiguas Landfill, the single major landfill that receives all household municipal waste in our unincorporated county areas. The landfill is located in a nearly undeveloped coastal canyon setting surrounded by hundreds of natural acres including National Forest, agriculture and privately-held lands on three sides (see Fig. 1- Site Map). The entrance to the landfill is directly off Highway 101 and about ¼ mile from the Pacific Ocean.

A perennial stream course, Pila Creek, originates upstream of the landfill within the National Forest. The watercourse enters the landfill property unaltered but has been graded as an open unpaved swale mid-site and then piped underground in the lower reaches of the facility. In storm events, the Creek brings sediment from the off-site upstream watershed into the landfill. Clarified surface drainage from the facility joins the swale and the combined flows discharge at the downstream facility boundary.

We have been taking surface water samples in Pila Creek (at monitoring point SW-1) upstream of the junction where landfill drainage combines with natural flows as part of the site permit with the Regional Water Quality Control Board for many years. The laboratory results for Total Suspended Solid (TSS) are shown in Table 1. Throughout the permit life, the requirements for sampling protocol were basically defined as annual monitoring at SW-1 and details about which storm of the season or what time within a storm sampling was to be performed were not included.

The TSS results vary widely and this is certainly due to factors such as: the particular storm intensity, the storm duration, and sample scheduling within the storm period. Note that some years no sample was even possible due to low rainfall. An in-depth study of these results to better understand the causes of sediment variation at this location is possible but outside the scope of these comments on the IGP.

Of utmost importance is the fact that sediment from outside of the site, in varying concentrations as shown in Table 1, is appearing at the discharge point of the landfill boundary. This sediment should be considered 'background' concentration and allowed to pass through to the receiving water.

In fact, sediment from upstream natural watersheds, exactly as exists in this situation, is what creates beach shoreline. Severely limiting the discharge of sediment, in accordance with the draft IGP requirements at Tajiguas Landfill, will result in beach erosion in the immediate area, with repercussions down shore. Beach nourishment, beach starvation, and shore erosion studies have been well documented by the Army Corp of Engineers in past years and can be referenced at your request.

Therefore, we request that the IGP should contain an explicit exception that allows TSS effluent adjustment for background concentrations particularly at beach nourishment locations. Furthermore, the IGP should contain provisions for case-by-case negotiation for TSS discharge exceptions.

Tajiguas Landfill takes a wide variety of thorough steps to reduce sediment discharge resulting from landfill operation disturbances every winter season. We prepare a Wet Weather Plan and install Best Management Practices (BMPs) prior to September 1 annually and have a detailed SWPPP on file at all times. The quality of work at Tajiguas Landfill landed us the SWANA 2001 Silver Award for Management Excellence, and our staff was recognized with the SWANA 2008 Gold Award for excellence in solid waste management. The RRWMD leadership ethic demonstrated in the past will continue to be upheld at Tajiguas Landfill for many years into the future.

Thank you for your time and do not hesitate to contact me to discuss these comments.

Nina Danza

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### FIGURE 1 – SITE MAP



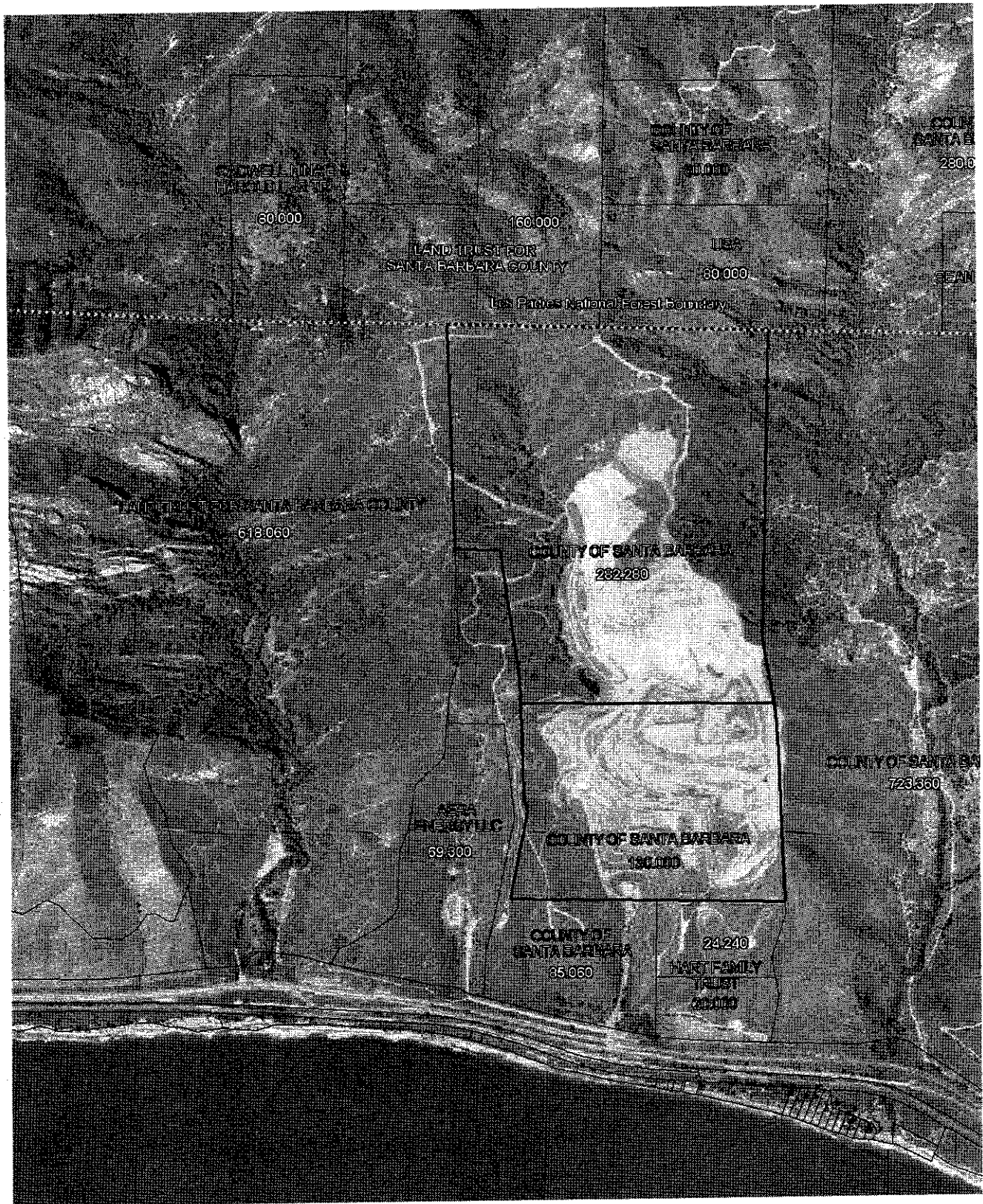


TABLE 1 – TSS LABORATORY RESULTS

Date	TSS mg/l
02/17/94	10,000
01/03/95	2,860
02/08/95	5,070
03/12/96	1,600

12/27/96	237
03/25/98	1,300
02/14/00	220
02/23/00	2,750
04/18/00	970
02/13/01	110
02/23/01	30
02/28/01	Not detected
03/06/01	556
03/15/01	Not detected
03/21/01	Trace
11/08/02	116
12/16/02	108
12/23/02	Not detected
02/13/03	178
05/03/03	1,180
02/25/04	45
12/28/04	Not detected
01/07/05	85
03/28/05	296
04/04/06	81
01/07/08	17
01/23/08	1,520
01/28/08	264
02/25/08	Not detected
02/17/09	19
01/20/10	6,000
01/26/10	6
02/09/10	60
12/29/10	6