

## Central Valley Regional Water Quality Control Board

18 March 2015

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1810 East Hazelton Avenue  
Stockton, California 95205

### **RESPONSE TO COMMENTS, TENTATIVE REVISED WASTE DISCHARGE REQUIREMENTS, FOOTHILL LANDFILL, SAN JOAQUIN COUNTY**

Central Valley Water Board permitting staff reviewed your 16 March 2015 comments (copy enclosed) on the recently-issued tentative revised Waste Discharge Requirements (WDRs) for the Foothill Landfill. The tentative WDRs are scheduled for consideration at the Central Valley Water Board's 16/17 April 2015 board meeting in Fresno. This letter provides Water Board staff's response to your comments. A summary of your comments and staff's response to each is provided below.

#### 1. LF-1 Closure

*Comment -- The County requests that the requirement for closure of LF-1 be removed from the WDR or delayed. LF-1 is already partially closed, with a final evapotranspirative (ET) cover on the top deck . . . The placement of additional soil cover over LF-1 at this point serves no environmental purpose, and imposes a significant financial burden on the County. The cost of full closure of LF-1 will be in excess of Three Million Dollars (\$3 Million). . .*

Staff Response – As noted in Finding 20 of the proposed WDRs, landfill LF-1 does not have a base liner and underlying geologic materials do not meet Title 27 containment standards. Given that the landfill has already been developed and it is not feasible to retrofit the landfill with a base liner, the remainder of the landfill unit (i.e., side slopes) must be closed. As previously discussed, existing soil cover on the landfill's side slopes may be of sufficient thickness and type to be approved as envirotranspirative (ET) final cover, but the Discharger will need to make this demonstration under the WDRs. If the Discharger is not able to make an ET cover demonstration for the remaining landfill slopes, another closure design would need to be proposed consistent with the WDRs. To provide the Discharger more time to complete the required tasks, the due dates in the WDRs for submitting closure-related documents and completing landfill closure have been extended by one year. See Closure and Postclosure Maintenance Specifications E.1 and E.2; and Provision H.9.

#### 2. LF-1 Leachate/Condensate Disposal

*Comment -- This Finding states that landfill gas (LFG) condensate from LF-1 cannot be discharged to LF-2. However, a review of the referenced regulatory criteria for condensate handling appears to indicate that the LF-1 condensate can be discharge to LF-2. . . Based on*

*the above State and Federal regulations for MSW landfills, it appears that the RWQCB can allow condensate from LF-1 to be discharged into LF-2.*

Staff Response – As noted in Finding 63 of the proposed WDRs, Subtitle D regulations (40 CFR 258.28) prohibit the discharge of leachate and landfill gas condensate from one landfill unit to another, but allow these liquids to be returned to the unit from which they were derived, provided that the landfill unit has a Subtitle D-compliant base liner and leachate collection and recovery system (LCRS). Since LF-1 is unlined and does not have an LCRS, these liquids cannot be returned to LF-1, and, consistent with the general prohibition, cannot be discharged to another landfill unit. The WDRs therefore prohibit the discharge of LF-1 leachate and/or gas condensate to either unit and require that the Discharger submit an Operations and Maintenance (O&M) Plan for the gas controls at the site, including plans for appropriate handling and disposal of leachate and/or landfill gas condensate collected from LF-1.

To allow the Discharger more time to reconfigure the landfill gas controls per above, the due date for cessation of LF-1 condensate discharges to LF-2 was extended by one year to 15 October 2016. The due date for submission of the gas controls O&M plan was also correspondingly extended. See Discharge Prohibition A.3.b and Provision H.8.

### 3. LF-2 Construction Specifications

Several comments took issue with engineered alternative design (EAD) component specifications included in Construction Specifications D.1 through D.4 for LF-2 expansion modules (e.g., base liner, side slope liner, LCRS, and sump). In general, the comments stated that the specifications or design criteria did not allow enough flexibility to allow for design modifications that might be necessary to take into account differences in future modules (e.g., size, configuration, drainage). The comments requested that such specifications be removed or modified so as to be more general or standard-based.

Staff Response – The above WDR construction specifications reflect Title 27 prescriptive standards and previously-approved engineered alternative designs (EADs) for existing landfill modules at the site. Such previously-approved EADs are typically included in WDR construction specifications to avoid the need for re-evaluation of designs as a Title 27 EAD each time an expansion module, or module phase, is proposed. The design report for a future module may simply recite that the design is consistent with the prescriptive standard or EAD specified under the WDR's construction specifications and provide supporting information. Minor variations from the designs specified in the WDRs (e.g., moisture specification for clay component) could also be considered for approval under Construction Specification D.6 without requiring revision of the WDRs. Significant modifications to the required designs (e.g., elimination of a required containment system component) would need to be re-evaluated as an EAD and approved under revised WDRs, however.

The WDRs are also reviewed every 5 years to determine whether they need to be updated or revised (e.g., to reflect a new EAD for an expansion module). Minor edits were made in response to comments on this item. See Construction Specifications D.1 through D.4.

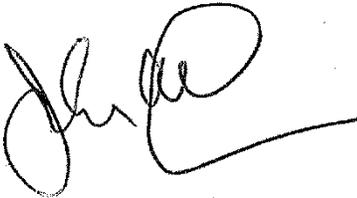
4. Other Comments

Minor edits were made in response to various other comments on the tentative WDRs (e.g., solid waste elevation survey frequency; due date for submission of preliminary closure and postclosure maintenance plan; language allowing both landfill units to be described in a single Water Quality Protection Standard Report).

Staff hopes that the above responses adequately address your comments regarding the tentative WDRs for the Foothill Landfill. Please note that the agenda package for the April 2015 Board meeting, including your comments on the tentative WDRs and Water Board staff's response, will be posted on the Water Board's website at the following link:

[http://www.waterboards.ca.gov/centralvalley/board\\_info/meetings/#2015](http://www.waterboards.ca.gov/centralvalley/board_info/meetings/#2015)

If you have any questions, please feel free to contact me at (916) 464-4641 or by email at [john.moody@waterboards.ca.gov](mailto:john.moody@waterboards.ca.gov).



JOHN MOODY  
Water Resources Control Engineer  
Title 27 Permitting and Mines

Enclosures:

1. 11 March 2015 comments letter
2. 16 March 2015 comments letter

cc w/o enclosure:

Christine Karl; Permitting & LEA Support; CalRecycle, Sacramento  
Andrew Deeringer, Office of Chief Counsel, SWRCB, Sacramento  
Robert McClellon, San Joaquin County Environmental Health Department, Stockton  
Julian Isham, CB&I Environmental and Infrastructure, Inc., Concord  
Scott Solari, Foothill Sanitary Landfill, Inc., Stockton