

**COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT**
123 East Anapamu Street
Santa Barbara, California 93101
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SCOTT D. MCGOLPIN
Director

December 10, 2009

Mr. Roger Briggs
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906 **sent via email**

**SUBJECT: DRAFT PROPOSED REVISED WASTE DISCHARGE REQUIREMENTS FOR
TAJIGUAS CLASS III LANDFILL, SANTA BARBARA COUNTY**

Dear Mr. Briggs:

The County of Santa Barbara, Public Works Department, Resource Recovery and Waste Management Division would like to thank you for the opportunity to comment on the subject. The following are our comments.

1. Number 19 Page 4 of the draft Waste Discharge Requirements (WDRs) next to last sentence. The site disposed of 702 tons per day. The 852 tons per day in the draft WDRs is the amount of waste received which includes waste material that was not disposed.
2. Part 1 D.1.b.iii of the draft Monitoring & Reporting Program (M&RP) says the monitoring parameters are in Table 2. In our review of the Draft M&RP, Table 1 is titled 'Monitoring Parameters'.
3. Table 2 of the draft M&RP. We are unclear of the reason why Gas Condensate is being required to be monitored for COCs every 5 years. Currently, gas condensate is being analyzed semiannually for volatile organic compounds. The results of the analysis are used in the pollutant mass removed calculation. The requirement to analyze for COCs would increase the County's cost, and the California Regional Water Quality Control Board (CRWQCB) staffs time to review the results.
4. Table 2 of the draft M&RP. We suggest that CRWQCB staff reconsider the site's monitoring program to be more cost-effective by reducing unnecessary tasks, monitoring points, and laboratory analyses. There are items in the M&RP that could be reduced or eliminated with no reduction in the protection of water quality at the site. These changes would result in cost savings to the County and

AA/EEO Employer

Thomas D. Fayram, Deputy Director

Rochelle Camozzi, Business Manager

Dacé Morgan, Deputy Director

Michael B. Emmons, County Surveyor

Mark A. Schleich, Deputy Director

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Item No. 12 Attachment No. 4
February 4, 2010 Meeting
Tajiguas Class III Landfill

the CRWQCB. These changes would be consistent with the CRWQCB Executive Officer's report presented at the October 23, 2009 Central Coast Regional Water Quality Control Board's Public Meeting.

We suggest that a site-specific list of Constituents of Concern (COCs) be developed. The draft M&RP would require a complete analysis of the 40 CFR Part 258 Appendix I and Appendix II constituents be sampled once every five years at 19 sample points. Based on many years of past COC sample analyses, a list of selected parameters that may reasonably be expected as a result of a release at the site should be developed. The site-specific COCs should include only those constituents that have been detected in previous samples of groundwater and leachate which are above the Practical Quantification Limit and have been verified by re-testing. For the site, the constituents listed in Table 1 of the draft M&RP would be satisfactory as COCs. It may be prudent to continue a full Appendix I and Appendix II analysis on select samples from the compliance point well (MW4), the GLCRS (LCRS#1), and leachate from the DW wells (LCRS#4) once every five years in order to update the site-specific COC list, if necessary. The CRWQCB Executive Officer has the authority to approve site-specific COCs per 40 CFR Sections 258.54 and 258.55, as referenced in 27 CCR Sections 20395, 20420, and 20425.

It is recommended that water well #3 should not be added to the M&RP as a detection monitoring well. This well's type of construction and operation as a water supply well do not make it suitable for monitoring on a regular basis. In the past M&RP, this well was sampled as a supplemental monitoring point. Well #3 was recently sampled for a full suite of Appendix I and Appendix II constituents, with no detection of landfill contaminants.

Thank you for your consideration of our comments. Please contact Imelda Cragin of my staff at (805)882-3613 if you have any questions.

Sincerely,



Mark A. Schleich
Deputy Director

cc: Imelda Cragin, Santa Barbara County Public Works
Mark Zuber, Santa Barbara County Public Works
Chris Wilson, Santa Barbara County Public Works
Project No. 129917

Hector Hernandez - RE: Tajiguas Landfill - HEARING NOTICE, Draft Proposed ORDER

From: "Sloan, Lisa" <Lisa.Sloan@sbcphd.org>
To: 'Hector Hernandez' <Hhernandez@waterboards.ca.gov>
Date: 12/18/2009 4:53 PM
Subject: RE: Tajiguas Landfill - HEARING NOTICE, Draft Proposed ORDER
Attachments: 11-3-09 Rev Fig 8.pdf

Hi Hector,

Here are my comments on the M&RP:

1. Section F.3.d. section on landfill gas is unclear. "The Discharger uses landfill gas monitoring includes perimeter soil-gas probes...to assess migration...."
2. This section should be updated to include the new perimeter monitoring probes that were added in November 2009.

Please find attached the locations of the proposed probes. They were installed on November 23, 24. I have not yet received the final plan. There may be a couple of minor changes. Mark Zuber is working on the final submittal.

Thanks for receiving my comments after the deadline.

Merry Christmas!

-Lisa

From: Sloan, Lisa
Sent: Friday, December 18, 2009 4:07 PM
To: 'Hector Hernandez'
Subject: RE: Tajiguas Landfill - HEARING NOTICE, Draft Proposed ORDER

Hi Hector,

I have reviewed the WDR's but not the M&RP Here are my comments and questions so far:

1. The County has installed new perimeter gas probes. Will you want to include them in the WDR's?
2. Finding 19. Please note that the Tajiguas landfill receives more than 200 tons per day on average residual waste from the MarBorg C&D Recycling and Transfer Facility at 119 N. Quarantina in Santa Barbara.
3. Prohibition B. 3C. The language is unclear. Is the intent to not prohibit friable asbestos from being discharged to the landfill? Perhaps a cross reference to Specification C14 would clarify.
4. Prohibitions B. 6, 7. Question, does the landfill currently comply with these prohibitions? Namely, 5-foot vertical separation from GW or 50-foot lateral setback from property lines or 100-foot lateral setback from surface water? Perhaps a cross reference to Specification C14 would clarify.

5. Specification C. 6C. Question, is the landfill liner system designed with a 100% secondary containment system?
6. Specification C. 7. Has the Executive Director approved the use of tarps or GW ADC during the winter months?
7. Provision E 17. Sewage sludge with over 50% moisture may be accepted in the lined areas. Does the JTD provide for the means by which the parameters for discharge of wet sludge may be monitored?
8. Provision E 27. Noticing the County also involves obtaining a permit prior to well construction, inactivation or destruction. Wells must be properly inactivated if they have been abandoned or have not been used for more than one year.
9. Provision E 32. This provision refers in error to JTD addendums. The JTD updates correctly should be referenced as JTD Amendments as per 27 CCR section 21590(a)(1).

I will try to finish the rest by the end of the day.

-Lisa

Lisa Sloan

Senior Environmental Health Specialist

Santa Barbara County Environmental Health Services

225 Camino Del Remedio, Santa Barbara, CA 93110

Lisa.Sloan@sbcphd.org

(805) 681-4942

From: Hector Hernandez [mailto:Hhernandez@waterboards.ca.gov]
Sent: Tuesday, December 15, 2009 2:21 PM
To: Sloan, Lisa
Subject: RE: Tajiguas Landfill - HEARING NOTICE, Draft Proposed ORDER

Hello Lisa,

Absolutely! Your comments are welcome so long as you get them to me ASAP.

Hector

Hector Hernandez
Water Resources Control Engineer
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101

San Luis Obispo, CA 93401-7906
(805) 542-4641
(805) 788-3530 (fax)

**** Please remember that the first three Fridays of each month are mandatory furlough days for state employees.**

If you are sending me a message on a furlough day I will get back to you the following Monday. **

>>> "Sloan, Lisa" <Lisa.Sloan@sbcphd.org> 12/15/2009 12:12 PM >>>

Hi Hector,

Did I miss the review/comment period on this? Would you still like comments if I have them?

-Lisa

Lisa Sloan

Senior Environmental Health Specialist

Santa Barbara County Environmental Health Services

225 Camino Del Remedio, Santa Barbara, CA 93110

Lisa.Sloan@sbcphd.org

(805) 681-4942

From: Hector Hernandez [mailto:Hhernandez@waterboards.ca.gov]

Sent: Tuesday, November 10, 2009 3:53 PM

To: Haines, John; Cragin, Imelda; Leipner, Joddi; Zuber, Mark; Schleich, Mark; Scott McGolpin; Spier, Travis; Wilson, Chris; Hillary Hauser; Dianne Ohiosumua; Sloan, Lisa; Michael Cullinane; Hector Hernandez; John Robertson; Leslie Graves; Thea Tryon

Cc: Cyndee Jones

Subject: Tajiguas Landfill - HEARING NOTICE, Draft Proposed ORDER

Tajiguas Landfill Contacts:

Attached for your information is November 10, 2009, "Land Disposal Program, Hearing Notice, Draft Proposed Revised Waste Discharge Requirements for Tajiguas Class III Landfill, Santa Barbara County." The Hearing Notice notifies persons on our Tajiguas Landfill

interested persons list that the Central Coast Regional Water Quality Control Board staff has prepared the draft revised Waste Discharge Requirements Order No. R3-2010-0006, draft Monitoring and Reporting Program No. R3-2010-0006, and draft Staff Report for the Tajiguas Class III Landfill.

These documents are posted on our website and are available for public review and comments during a 30-day public review comment period. The Central Coast Water Board will hear public comments and consider this matter at its February 4, 2010 Board meeting in San Luis Obispo.

Please contact me directly if you have any questions or require clarification.

Hector

Hector Hernandez
Water Resources Control Engineer
California Regional Water Quality Control Board
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