



**COUNTY OF LAKE**  
**PUBLIC SERVICES DEPARTMENT**  
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LARS EWING  
Director

March 1, 2024

Mr. Brad Shelton, P.G.  
Senior Engineering Geologist  
Chief, Title 27 Permitting and Mining Unit  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, California 95670

Subject: County of Lake Review of Tentative Waste Discharge Requirements and  
Monitoring and Reporting Program  
Eastlake Sanitary Landfill, Lake County, California

Dear Mr. Shelton,

The County of Lake, owner and operator (“Discharger”) of the Eastlake Sanitary Landfill (Landfill, or Site), through its’ Public Services Department, has reviewed the following documents, issued on February 1, 2024 by the California Regional Water Quality Control Board (RWQCB), Central Valley Region:

- [Tentative] Waste Discharge Requirements Order No. R5-2024-##### for the County of Lake’s Eastlake Sanitary Landfill
- [Tentative] Monitoring & Reporting Program R5-2024-#####, for the County of Lake’s Eastlake Sanitary Landfill

This letter provides the County’s comments on the above. Our comments are intended to provide clarification on findings and provisions in the Tentative WDRs and Tentative MRP to ensure that these items are accurately reflected in the public record. We respectfully request your thoughtful consideration and incorporation of the County’s comments as you issue the final documents.

## **TENTATIVE WASTE DISCHARGE REQUIREMENTS COMMENTS**

### FINDINGS

Finding 3, Table 1. The planned acreage of Phase 1 is 7.1 acres, not 8.1 acres.

Finding 3, Table 1, Note 2. The planned acreage of Phase 4 is 3.7 acres, not 5.0 acres. Additionally, it would be more accurate to say that Phase 4 is a lateral expansion and vertical expansion over the Area 1 footprint, and a small portion of Area 2.

Finding 19.a. The planned acreage is 19.5 acres, not 20.5 acres.

Finding 19.b. The new entrance road and utilities are required due to the Phase 4 expansion, not the Phase 1 expansion.

Finding 48. The stormwater sedimentation basin discharges to Molesworth Creek, not the unnamed tributary to Cache Creek. The sedimentation basin constructed during Phase II will continue to intermittently discharge to Molesworth Creek.

Finding 52. SWMS-3 should be listed as “Background” (Upstream).

Finding 65. It is important to note that the Central Valley Water Board’s March 30, 2018, letter to the County, “Review of Engineering Feasibility Study Revision 2 and 2017 Monitoring Data” required an additional action to CAO R5-2015-0713 of a workplan to install landfill gas extraction wells. The County submitted the workplan on May 31, 2018, which is currently being evaluated by Central Valley Water Board staff.

Finding 68. The first sentence ends in an ellipsis.

Finding 79. The floor of Phase 1 as designed has a minimum separation of approximately 20-ft from groundwater, consequently the design does not include an underdrain or central collection sump.

Finding 91. The County’s current fund balances (financial assurances) are now as follows:

Requirement	Current Balance
Closure and Post-Closure Maintenance	\$13,154,755
Corrective Action	\$1,078,315

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## REQUIREMENTS

Requirement D.34. This requirement seems to conflict with Requirement D.1, which authorizes preparatory earthmoving and grading for liner construction. Please clarify.

Requirement I, Table 11 (Time Schedule), Item No. 4. The “Task” should include reference to the workplan to install landfill gas extraction wells (described in the comment to Finding 65 earlier) that is awaiting approval.

## **TENTATIVE MONITORING & REPORTING PROGRAM COMMENTS**

Provision B.3. The stormwater sedimentation basin discharges to Molesworth Creek, not the unnamed tributary to Cache Creek.

Provision B.3.a, Table 11. SWMS-3 should be listed as “Background” (Upstream).

Provision C. It is challenging for the County to comment on this entire section, Corrective Action Monitoring Program (CAMP) for CAO R5-2015-0713 when the County is waiting on a response from the Central Valley Water Board to the CAO workplan submitted by the County to the Central Valley Water Board on May 31, 2018. However, the County offers the following preliminary suggestions:

- Provision C.4, Table 19. Recommend changing the term “Plant” to “Flare Station”. Recommend changing the sampling frequency of methane in influent from “Daily” to “Monthly”.
- Provision C.4.a, Table 21. Recommend the unit measurement for static pressure in the wellhead be changed from Inches Hg to Inches WC.


Provision E.2.m. It is challenging for the County to comment on this section related to ongoing Corrective Action for CAO R5-2015-0713 when the County is waiting on a response from the Central Valley Water Board to the CAO workplan submitted by the County to the Central Valley Water Board on May 31, 2018.

## **CLOSING**

The County is committed to operating the Landfill to remain in compliance with all applicable regulations and permit requirements, and to protecting water quality, air quality and public safety. We are equally committed to providing safe and affordable MSW disposal services to the residents and businesses of Lake County.

We appreciate your thoughtful consideration of the above comments in drafting the final WDRs for the Eastlake Sanitary Landfill. If you have any questions please contact me at 707-262-1618.

Sincerely,



Lars Ewing, PE  
Public Services Director

cc: Erik Nielsen, SHN Consulting Engineers  
Arthur E. Jones, Jr., SCS Engineers  
Mike Bradford, SCS Engineers