

Los Angeles Regional Water Quality Control Board

April 3, 2013

Mr. Khalil Gharios, Division Manager
City of Los Angeles Department of Public Works
1149 South Broadway Street, 8th Floor
Los Angeles, California 90015

RESPONSE TO COMMENTS - TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR SHELDON-ARLETA LANDFILL, LOS ANGELES, CALIFORNIA (File No. 60-100, CI 2765, Geotracker Global ID L10008273857)

Dear Mr. Gharios:

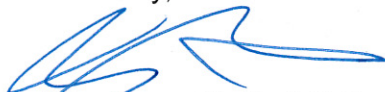
The Regional Water Quality Control Board (Regional Board) is in receipt of your letter dated March 14, 2013, that includes comments regarding the tentative revised waste discharge requirements (WDRs) for the Sheldon-Arleta Landfill, a former Class III municipal solid wastes disposal facility at 12455 Wicks Street, Sun Valley, California. The tentative WDRs were sent to you and other interested parties on February 15, 2013.

Regional Board staff has reviewed the comments and prepared the attached responses to comments. Also attached are copies of the comments received and a revised tentative Order that includes all revisions made after February 15, 2013.

Please be advised that the April 4, 2013, Board Meeting, at which the item was originally scheduled, has been canceled. The tentative Order is now rescheduled to be heard on May 2, 2013. In accordance with administrative procedures, this Regional Board, at a public meeting to be held on May 2, 2013, beginning at 9:00 AM., at the Metropolitan Water District of Southern California, 700 North Alameda Street, Board Room, in Los Angeles, California, will consider the enclosed tentative WDRs. It is expected that the Regional Board will take action at the meeting, however, as testimony dictates, the Regional Board at its discretion may order further investigation.

If you have any questions or need additional information, please contact Mr. Douglas Cross (Project Manager) at (213) 620-2246 or dcross@waterboards.ca.gov, or me at (213) 620-2253 or wyang@waterboards.ca.gov.

Sincerely,



Wen Yang, Ph.D., C.E.G., C.H.G.
Chief of Land Disposal Unit

Enclosures

cc: Leslie Graves, Land Disposal Program, State Water Resource Control Board
Martin Perez, California Department of Resources Recycling and Recovery
David Thompson, City of Los Angeles Local Enforcement Agency

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

**WASTE DISCHARGE REQUIREMENTS
for
CITY OF LOS ANGELES, BUREAU OF SANITATION
(Sheldon Arleta Landfill)**

RESPONSE TO COMMENTS

The public comment period for the tentative Order started on February 15, 2013, when the tentative Order was mailed to the City of Los Angeles, Bureau of Sanitation (Discharger) and interested persons, and ended on March 15, 2013, which was the deadline for submitting comments set in the cover letter transmitting the tentative revised Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (M&RP). During the public comment period, Regional Board staff received comments regarding the tentative Order from the Discharger that were submitted on March 14, 2013, by email. The comments are responded to as follows:

Comment No. 1 of the WDRs (On Page 6 of the tentative WDRs, Finding No. 30.)

[Page 6, Background 30] The wells IT-SA4 and 4897D are no longer working wells and cannot be used for monitoring leachate.

Response: Staff agrees that Well IT-SA4 should be removed from the monitoring and sampling program. However, the Report of Waste Discharge (ROWD) submitted by the Discharger on October 24, 2012, for the revision of the WDRs, proposed the use of well 4897D to determine if liquid is accumulating in the refuse cell. The well is necessary to observe and sample any leachate that may be produced at the Landfill. If the well is inoperable, it must be replaced in accordance of Sections D.1 or D.6 of the WDRs. Finding No. 30 of the tentative WDRs has been modified accordingly.

Comment No. 2 of the WDRs (On Page 7 of the tentative WDRs, Section C.1)

[Page 7, C1] There are several part(s) of the WDRs that are indeterminate. 1) The construction schedule for the park is dependent on funding that is not known. 2) The groundwater well installation is not known. The FCPCMP should be submitted either when items are known or they should be excluded.

Response: Staff disagrees with this comment. The Discharger is responsible for the implementation of all requirements in the WDRs and the MRP. All required reports must be submitted on time. The extension of any deadlines in the WDRs or the MRP must be approved by the Regional Board Executive Officer (Executive Officer) prior to the due date. The tentative WDRs are not revised in responding to this comment.

Comment No. 3 of the WDRs (On Page 9 of the tentative WDRs, Section D.1.)

[Page 9, D1] IT-SA1 and IT-SA3 should be redrilled with IT-SA8 together at the same time. The water levels of IT-SA1 and IT-SA3 have been historically inconsistent and IT-SA8 has been dry. It would probably be easier to redrill all three at once so that the samples could be taken without disruptions created by water levels going below IT-SA1 and IT-SA3. All other wells at the site should be abandoned since they are either damaged or are dry.

Response: Staff agrees with this comment. However, Section D.1. of the WDRs already states that wells IT-SA1 and IT-SA3 shall be replaced along with well IT-SA8 if liquid samples cannot be collected from these wells. Therefore, no revision of the tentative WDRs is necessary to address this comment.

Comment No. 4 of the WDRs (On Page 9 of tentative WDRs, Section D.6.)

[Page 9, D6] 30 days for submittal of a technical report regarding the construction details of new wells is in conflict with the report required in 180 days.

Response: Staff agrees with this comment. Section D.6 of the WDRs has been modified to clarify that the requirement is only applicable after the replacement of monitoring wells required in Section D.1 of the WDRs.

Comment No. 5 of the WDRs (On Page 11 of tentative WDRs, Section E.4.)

[Page 11, E4] Add E4 for discontinuation of the DMP if five consecutive years of data indicate there is no significant release.

Response: Staff disagrees with this comment. It is difficult to predict how many years of monitoring are needed to determine if the closed Landfill has a significant release of pollutants to groundwater. However, the Executive Officer is authorized to make revisions to the MRP, including the termination of groundwater monitoring at the Landfill, if such revisions are warranted. The tentative WDRs are not revised in response to this comment.

Comment No. 6 of the WDRs (On Page 14 of tentative WDRs, Section H.11.)

[Page 14, H11] A 5.0 earthquake within 100 km will be difficult to identify and call in or email since these events are sometimes not widely reported. Shouldn't this report be dependent on actual changes in the site conditions?

Response: Staff disagrees with the comment. This requirement is included in all current WDRs for landfills in the Region. The Landfill shall not be exempted from this requirement. No revision is made to the tentative WDRs in response to this comment.

Comment No. 7 of the WDRs (On Page 14 of tentative WDRs, Section H.12.)

[Page 14, H12] There are no slopes that contain refuse at the site. The only slopes are landscaped using cover material.

Response: Staff agrees that there are currently no steep slopes at the Landfill. However, the requirement is included to address situations if slopes do occur at the Landfill in the future. No revision is made to the tentative WDRs in response to this comment.

Comment No. 8 of the WDRs (On Page 20 of tentative WDRs, Figure 5.)

[Page 20, map] Label IT-SA3 BACKGROUND, IT-SA1 & IT-SA9 Monitoring. Put new well [call it IT-SA9] just outside the landfill [green square] vertex.

Response: Staff agrees with the comment. Figure 5 of the WDRs and Figure 1 of the MRP has been changed to reflect the proposed well IT-SA9. Table T-1 of the MRP, Section II.A, has been modified accordingly.

Comment No. 1 of the MRP (On Page T-10 of tentative MRP, Item No. A.9)

[T-10, A9] The Leachate Monitoring wells IT-SA4 and IT-SA5 are inoperable and can't be used to extract a leachate sample. The new and old groundwater monitoring well network at Sheldon Landfill is not capable of sampling leachate from the landfill.

Response: See response to Comment 1 above.

CITY OF LOS ANGELES
CALIFORNIA



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MAYOR

BUREAU OF SANITATION

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March 14, 2013

California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Attention: Wen Yang, Chief of Land Disposal Unit
Doug Cross, Engineering Geologist, Landfill Disposal Unit

**COMMENTS TO TENTATIVE WASTE DISCHARGE REQUIREMENTS – SHELDON-ARLETA
LANDFILL (FILE NO. 60-100, CI 2765, GEOTRACKER GLOBAL ID L10008273857)**

The City of Los Angeles hereby submits its comments and recommended revisions to the Sheldon-Arleta Landfill Tentative Waste Discharge Requirements (WDR) received from the LARWQCB dated February 15, 2013. The following are our recommended changes for your consideration:

BACKGROUND

1. [Page 6, Background 30] The wells IT-SA4 and 4897D are no longer working wells and cannot be used for monitoring leachate.

C. REQUIREMENTS FOR POST CLOSURE MAINTENANCE

1. [Page 7, C1] There are several part of the FCPCMP that are indeterminate. 1)the construction schedule for the park is dependent on funding that is not known. 2) The groundwater well installation is not known. The FCPCMP should be submitted either when items are known or they should be excluded.

D. REQUIREMENTS FOR GROUNDWATER MONITORING

1. [Page 9, D1] IT-SA1 and IT-SA3 should be redrilled with IT-SA8 together at the same time. The water levels of IT-SA1 and IT-SA3 have been historically inconsistent and IT-SA8 has been dry. It would probably be easier to redrill all three at once so that the samples could be taken without disruptions created by water levels going below IT-SA1 and IT-SA3. All other wells at the site should be abandoned since they are either damaged or are dry.
2. [Page 9, D6] 30 days for submittal of a technical report regarding the construction details of new wells is in conflict with the report required in 180 days.

E. REQUIREMENTS FOR DETECTION MONITORING PROGRAM (DMP)

1. [Page 11, E4] Add E4 for discontinuation of the DMP if five consecutive years of data indicate there is no significant release.



H. GENERAL PROVISIONS

1. [Page 14, H11] A 5.0 earthquake within 100 km will be difficult to identify and call in or email since these events are sometimes not widely reported. Shouldn't this report be dependent on actual changes in the site conditions?
2. [Page 14, H12] There are no slopes that contain refuse at the site. The only slopes are landscaped using cover material.

FIGURE 5 – EXISTING GROUNDWATER WELL AND LEACHATE WELL LOCATIONS

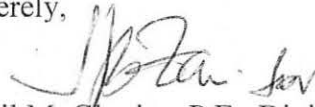
1. [Page 20, map] Label IT-SA3 BACKGROUND, IT-SA1 & IT-SA9 MONITORING. Put new well [call it IT-SA9] just outside the landfill [green square] vertex.

A. GROUNDWATER MONITORING

1. [Page T-10, A-9] The Leachate Monitoring wells IT-SA4 and IT-SA5 are inoperable and can't be used to extract a leachate sample. The new and old groundwater monitoring well network at Sheldon Landfill is not capable of sampling leachate from the landfill.

Should you have any questions please contact John Hamilton at (213) 847-2700.

Sincerely,



Khalil M. Gharib, P.E., Division Manager
Solid Resources Processing & Construction Division

C: David Thompson, LEA
Constantin Pano, BOS
John Karroum, BOS
Jonathan Zari, BOS 