

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

**WASTE DISCHARGE REQUIREMENTS  
for  
VULCAN MATERIALS COMPANY  
(Sun Valley Landfill)**

**RESPONSE TO COMMENTS**

The public comment period for the tentative Order started on August 22, 2014, when the tentative Order was sent to the Vulcan Materials Company (Discharger) and interested persons, and ended on October 3, 2014, 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 (MRP). During the public comment period, Regional Water Quality Control Board (Regional Board) staff received comments regarding the tentative Order from the Discharger that were submitted on September 18, 2014, by email. The comments are responded to as follows:

**Comment No. 1, from the WDRs (On Page 1, Finding 2 of the tentative WDRs)**

*Page 1, Finding 2: The lowest point within the pit is 810 feet amsl (not 820 feet). It should be noted that the vertical datum noted on Vulcan's topographic survey of the Landfill is North American Vertical Datum of 1988 (NAVD88), not above mean sea level (amsl). All documents reviewed appear to reference amsl as the vertical datum, except the aerial topographic survey which references NAVD88. The difference between these two datums appears to be approximately three feet, with amsl having a lower elevation. This is fairly minor difference given the information being presented and continued use of amsl for the vertical datum in the tentative WDRs appears appropriate.*

**Response:** Staff agrees with this comment. Finding 2 of the WDRs has been modified accordingly.

**Comment No. 2, from the WDRs (On Page 1, Finding 4 of the tentative WDRs)**

*Page 1, Finding 4: The 1995 Order No. 82-072 states the estimated capacity of the Landfill to be 18 million tons (not cubic yards) and expected loading rate of 3,750 tons per day (not cubic yards per day). The rest of information in this finding appears accurate.*

**Response:** Staff agrees with this comment. Finding 4 of the WDRs has been modified accordingly.

**Comment No. 3, from the WDRs (On Page 2, Finding 9 of the tentative WDRs)**

*Page 2, Finding 9: The phrase “and initiated” in the first sentence seems inappropriate; please consider deleting this phrase.*

**Response:** Staff agrees with this comment. The words “and initiated” have been deleted from Finding 9.

**Comment No. 4, from the WDRs (On Page 2, Finding 9 of the tentative WDRs)**

*Page 2, Finding 9: The word “proposed” seems inappropriate in the second sentence; please consider deleting this word.*

**Response:** Staff agrees with this comment. The word “proposed” has been deleted from Finding 9.

**Comment No. 5, from the WDRs (On Page 2, Finding 9 of the tentative WDRs)**

*Page 2, Finding 9: The third sentence, starting with “In June 2000 up-gradient well 4914F ...”, seems out of place given the rest of the finding discusses activities between 1988 and 1992. Please consider moving this sentence as a stand-alone finding between existing findings 10 and 11.*

**Response:** Staff agrees with the comment. The finding has been revised accordingly.

**Comment No. 6, from the WDRs (On Page 2, Finding 10 of the tentative WDRs)**

*Page 2, Finding 10: The 1982 Order has reference No. 82-72 (not 82-031).*

**Response:** Staff agrees with the comment. The finding has been revised accordingly.

**Comment No. 7, from the WDRs (On Page 2, Finding 15 of the tentative WDRs)**

*Page 2, Finding 15: Please consider deleting the last sentence of this finding, which starts with “This Order requires the addition of one more groundwater monitoring point ...”. It appears inappropriate to include a directive from the Water Board in these statements of findings.*

**Response:** Staff disagrees with this comment. The finding is only pointing out that the WDRs will be directing the Discharger to add one additional monitoring point. No revision is made to the tentative WDRs in response to this comment.

**Comment No. 8, from the WDRs (Findings)**

*The findings do not reference that the Landfill is subject to reclamation as required by the State Surface Mining and Reclamation Act of 1975 (SMARA) (Public Resources Code § 2710 et seq.). Similar to the Reliance Landfill WDRs, a finding like the following should be considered:*

*The Landfill is subject to reclamation as required by the State Surface Mining and Reclamation Act of 1975 (SMARA) (Public Resources Code § 2710 et seq.). The requirements in this Order, as they are met, are in conformance with the requirements of SMARA.*

*Unlike the Reliance Landfill in the City of Irwindale, the City of Sun Valley has not established an ordinance that requires the preparation of a reclamation plan be submitted for approval.*

**Response:** Staff agrees with the comment. A new finding (No. 17) has been added to the WDRs.

**Comment No. 9, from the WDRs (On Page 4 of tentative WDRs, Section A.2.)**

*Page 4, Acceptable Materials, Paragraph 2: It is not clear as to how Vulcan can determine that a California legal point of disposal is in compliance with their WDRs, and seems overly burdensome to Vulcan to attempt to make such determination. It appears to be more appropriate to state that Vulcan needs to confirm that California sites are lawfully permitted, as stated for out-of-state disposal sites.*

**Response:** Staff disagrees with this comment. If the Discharger is not sure whether a disposal point is in full compliance with its WDRs, they can always verify with staff from the appropriate regional water quality control board. No revision is made to the tentative WDRs in response to this comment.

**Comment No. 10, from the WDRs (On Page 5 of tentative WDRs, Section C.1.)**

*Page 5, Groundwater Monitoring, Paragraph 1: The draft WDRs require the addition of a groundwater monitoring point to the groundwater monitoring program, either (a) existing offsite or (b) new onsite or offsite. The stated purpose is to establish an accurate groundwater gradient. This contrasts the CDM Smith statement in the Report of Waste Discharge (ROWD) update letter dated July 7, 2014:*

*“The hydrogeologic setting presented in the EIR and other historical documents identified in Section 1 continue to be applicable and does not require an update. The two existing wells at the Landfill are constructed appropriately to assess significant changes to groundwater elevation and flow direction during the period of anticipated future operations at the Landfill and do not require the WDRs and MRP to be updated. In addition, groundwater flow determinations are made periodically at the adjacent Bradley sanitary landfill and are assessed for comparison to the Landfill.”*

*The data collected to date at the Landfill and at the Bradley sanitary landfill do not indicate that the groundwater gradient has significantly changed since it was evaluated for the 1988 Solid Waste Water Quality Assessment Test (SWAT). Given the proximity of the two landfills, an additional monitoring point to establish a more accurate groundwater gradient appears unnecessary. If the Water Board would like to better evaluate groundwater gradient in the local vicinity, we suggest the Water Board request Vulcan and the Bradley sanitary landfill well owner to collect data over concurrent periods and submit the combined data on periodic local groundwater gradient maps.*

**Response:** Staff disagrees with this comment. Groundwater gradients can vary, particularly when intermittent groundwater spreading takes place at the proximity to a site. A third monitoring point is necessary to determine the groundwater gradient at the site. The requirement in the tentative Order does not prevent the Discharger from using one of the groundwater monitoring wells at the nearby Bradley Landfill for the establishment of groundwater gradient. However, it is the Discharger's responsibility to obtain permission from the owner of the wells for such usage. No revision is made to the tentative WDRs in response to this comment.

**Comment No. 11, from the MRP (On Page T-2 of tentative MRP, Item No. II.C.)**

*Page T-3, Monitoring and Reporting Program, Water Quality Monitoring, Paragraph A: Please see comment above regarding need for one additional groundwater monitoring point.*

**Response:** Staff disagrees with this comment. Refer to response to Comment No. 10 above.