March 25, 2013

Mr. John Madigan
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Mr. Madigan:

The following are my comments on the draft permit for Ox Mountain Landfill (CA0029947):

1) The fact sheet states that the permit addresses only the discharge of treated groundwater, but also mentions that storm water drainage and roadwash are treated in the sedimentation basin prior to discharge. Please clarify the exact nature of the permitted discharge in both the fact sheet and Table 2 of the final permit.

2) I support your BPJ application of EPA's ELGs for landfills to this permitted discharge. In addition, the final permit should be revised to include effluent limits for oil and grease and settleable matter, as specified in Basin Plan Table 4-2.

3) I agree with your finding of the need for an effluent limit for chronic whole effluent toxicity.

4) The effluent and receiving water minimum detection limits for some organic parameters with CTR criteria/Basin Plan objectives are high in comparison to those achieved under other NPDES permits issued by Regional Board 2. The minimum detection limits for these parameters should be improved during the term of the reissued permit.

5) The fact sheet for the final permit should discuss how the site is addressed/regulated for industrial storm water and sanitary wastewater.

6) During the term of the reissued permit, I recommend that more be done at the site to reduce the need for an ammonia mixing zone. This could include improvements in ammonia treatment for the treated groundwater discharge and limiting the frequency of discharge to the wet season only.

If you have questions regarding these comments, please call me at 415/972-3524.

Sincerely,

Robyn Stuber, Environmental Scientist
U.S. EPA Region 9
NPDES Permits Office (WTR-5)