

California Regional Water Quality Control Board
San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
City of Petaluma
Petaluma Landfill, Class III Solid Waste Disposal Facility
Petaluma, Sonoma County

The Regional Water Board received written comments from the City of Petaluma (City) on a tentative order distributed for public comment. The comments are summarized below in italics (paraphrased for brevity) and followed by staff responses. Revisions to the tentative order are shown with ~~striketrough~~ text for deletions and underlined text for additions. For the full content and context of the comments, refer to the comment letter. To request copies of the comment letter, please contact Alan D. Friedman at (510) 622-2347 or alan.friedman@waterboards.ca.gov.

City of Petaluma

City Comment 1

The City requests removing the Self-Monitoring Program requirement to analyze benzene, toluene, ethylbenzene, and xylenes by United States Environmental Protection Agency (EPA) Method 8020 because the Self-Monitoring Program already requires the analysis of these compounds as part of EPA Method 8260 for volatile organic compounds.

Response

We agree. We removed the requirement to analyze benzene, toluene, ethylbenzene, and xylenes by EPA Method 8020 from Self-Monitoring Program Table 1 of the Revised Tentative Order.

City Comment 2

The City points out that semi-volatile organic compounds (SVOCs) and polychlorinated biphenyls (PCBs) are not typically detected in groundwater at most landfills. The City requests that these parameters be listed as constituents of concern (COCs) with a 5-year sampling frequency as opposed to a semi-annual sampling frequency. The City requests that semi-annual monitoring for SVOCs and/or PCBs only be required if they are detected in the first groundwater monitoring event.

Response

We agree that semi-annual SVOC and PCB monitoring is not necessary. We revised Self-Monitoring Program Table 1 of the Revised Tentative Order by removing the requirement to analyze SVOCs and PCBs semi-annually and adding SVOCs and PCBs to the list of COCs in Self-Monitoring Program Table 1 Note 3 that have a 5-year

monitoring frequency. The Regional Water Board may require additional monitoring should the first 5-year sampling event indicate it is warranted.

City Comment 3a

The City requests to remove the following text from Finding 5 (Regulatory History):

In 2014, during preparations for development of an adjacent property to the north and east of the Landfill (2592 Lakeville Highway, Petaluma), debris from an old burn dump, possibly connected to and/or associated with the Landfill, was found outside the final closure cap on property previously owned by the City of Petaluma. In 2022 to 2023, the burn dump debris was excavated and disposed of by the adjacent property developer.

The City asserts that these claims are unsubstantiated and were resolved through a final and binding settlement agreement. The City provided a copy of the settlement agreement and additional information to support its request with the comment letter. The City does not contest the associated requirement in Provision C.5 to identify and remove any waste found outside of the final cap.

Response

We agree. We removed the text from Finding 5 of the Revised Tentative Order.

City Comment 3b

The City requests revising Finding 5 (Regulatory History) to be consistent with the associated requirement in Provision C.5 (Waste Area Delineation Report). The City does not propose any revisions to Provision C.5 requirements.

Response

We revised Finding 5 (Regulatory History) to be consistent with Provision C.5 as follows:

... Provision C.5 of this Order requires the Discharger to ~~delineate~~ submit a delineation report that documents the lateral limits of the Landfill, ~~identify and properly manage. If any waste outside the final closure cap is identified,~~ the Discharger is required to properly manage the waste and submit a technical report documenting the method(s) used. ~~summarizing the results of the investigation.~~

City Comment 4

The City requests to revise the last sentence of Finding 8 (Landfill Closure) as follows:

The final cover was completed in November 1995. The site was certified closed on May 8, 1996 and Final Documentation Report submitted August 29, 1996.

Response

We revised the last sentence of Finding 8 (Landfill Closure) in response to the comment as follows:

The ~~final cover~~ Landfill was certified closed on May 8, 1996, and the Final Documentation Report was submitted on August 29, 1996. ~~completed in November 1995.~~

We also revised Findings 2 and 3 to state that the Landfill was certified closed in 1996.

Staff-Initiated Changes

We revised Provisions C.6.b and C.6.d (Long-Term Flood Protection Plans) of the Revised Tentative Order to reflect the most current State of California Sea-Level Rise Guidance published by the Ocean Protection Council in June 2024, as follows:

- b. Be based on providing protection from the estimated 100-year storm event, on top of the 2100 “intermediate” ~~2050 “medium-high”~~ (0.5% probability of exceedance) or “intermediate-high” ~~“extreme”~~ risk aversion sea level rise scenarios as described in the most recent OPC Sea-Level Rise Guidance. The 100-year storm event shall take into account astronomical tides and storm surge as well as wave run-up, seasonal effects (e.g., El Niño conditions), and discharge from local tributaries (e.g., as modeled by the USGS CoSMoS tool).
- d. Propose a phased adaptation strategy that briefly describes the potential future projects that may be necessary to provide for protection from the 2100 “intermediate” ~~“medium-high”~~ or ~~“extreme”~~ “intermediate-high” sea level rise scenarios as described in the most recent OPC Sea-Level Rise Guidance, as well as potential accompanying changes in groundwater rise and extreme storm events. The strategy shall allow for a range of future actions at different climate change thresholds to address uncertainty and allow for flexibility over the long term.