

Regional Water Quality Control Board
Central Valley Region

Response to Written Comments for
Tentative Waste Discharge Requirements
for
Kings Waste and Recycling Authority
Corcoran Landfill, Kings County

This document contains the responses to written comments received from interested parties regarding the proposed tentative Waste Discharge Requirements (WDRs) for the Kings Waste and Recycling Authority (KWRA), Corcoran Landfill, Kings County for postclosure maintenance and corrective action. The Tentative WDRs, R5-2014-XXXX, were prepared to incorporate postclosure maintenance requirements and the approved corrective action program. Currently, WDRs Order 5-00-159 currently regulates the facility.

The Tentative WDRs were circulated on 18 September 2014 for public comment, ending on 20 October 2014. A total of one letter/email was received and these comments are addressed below.

Comments submitted during the comment period were received from the following:

- A. Jeff Monaco, Kings Waste and Recycling Authority, 13 October 2014

RESPONSE TO COMMENTS

Comment A.1:

Finding No. 20 (WDRs page 3) states in pertinent part, *“However, the unlined Sweet Canal borders the facility on the north and along the west”*.

KWRA respectfully requests that Finding No. 20 should be changed to read: However, the unlined Sweet Canal borders the facility on the north and along the east.

Response A.1:

The requested revision has been made to Finding No. 20.

Comment A.2:

Finding No. 38 (WDRs page 6) states in pertinent part, *“On 9 April 2014, Central Valley Water Board staff ...”*The actual date was 9 April 2004. Consequently Finding No. 38 should be changed accordingly to read: On 9 April 2004. This change needs to be made on the Information sheet as well.

Response A.2:

The requested revisions have been made to Finding No. 38 and the Information Sheet.

Comment A.3:

F. MONITORING SPECIFICATIONS (WDRs Item 2, page 11) states in pertinent part, *“The Discharger shall, for any landfill unit in a corrective action monitoring program, comply with the corrective action monitoring program provisions of Title 27,MRP R5-2014-XXXX, and the Standard Monitoring Specifications listed in Section I of SPRRs”*.

Stated, in part, on Page 6 of the Tentative WDRs, GROUNDWATER DEGRADATION AND CORRECTIVE ACTION (section), Finding 38 states that: *“On 9 April 2014, Central Valley Water*

Board staff approved a CAP that consisted of monitored natural attenuation (MNA), conditioned on the total cumulative VOC concentration remaining below an action level of 5 micrograms per liter (μL)". Also, Finding 39 states: "In a 24 July 2006 letter, Central Valley Water Board staff considered the inorganic EMP to be complete and, based upon the results, did not require the Discharger to submit an EFS or implement a CAP".

Based on the above KWRA respectfully requests that the wording of the subject item be changed to read: The Corcoran Landfill, which consists of only one WMU, is not currently under a corrective action program either for VOCs or for inorganic constituents. In the event that the total cumulative VOC concentration exceeds 5- μl over two semi-annual sampling events, then KWRA is required to comply with the corrective action monitoring program provisions of Title 27, MRP

Response A.3:

In the above referenced approval letter, Board staff approved a phased approach to corrective action, which allowed for MNA in lieu of a groundwater extraction and treatment system. Task i of Cleanup and Abatement Order 97-714 required KWRA to implement a corrective action program. KWRA complied with this task when MNA was implemented as part of the approved CAP. To provide further clarification, Finding 39 will be revised as follows:

In a 24 July 2006 letter, Central Valley Water Board staff considered the inorganic EMP to be complete and, based upon the results, did not require the Discharger to submit EFS or implement a CAP for the release of inorganic constituents.

No changes will be made for the VOCs.

Comment A.4:

The Titles of Attachments A and B state in pertinent part: "*For Post-Closure maintenance and Corrective Action*". KWRA respectfully requests that the wording of the subject items in Attachments A and B be changed to read: For Post-Closure Maintenance and Detection Monitoring.

Response A.4:

Currently, KWRA uses MNA as a corrective action measure. The requested revisions will not be made.

Comment A.5:

MRP, Item A, Monitoring (page 1, bottom-of-page Table Item A.3) states: "*Seep Monitoring*". KWRA respectfully requests that for clarity and historical consistency that the above item should be changed to read: A.3 Leachate Seep Monitoring.

Response A.5:

The requested revisions have been made.

Comment A.6:

MRP, Item A, Monitoring (page 1, bottom-of-page Table Item A.5) states: "*Corrective Action Monitoring*". Comment: KWRA respectfully requests that because the Corcoran Landfill is not in corrective action item "A.5 Corrective Action" should be eliminated entirely.

Response A.6:

See Responses A.3 and A.4.

Comment A.7:

MRP, Item 1, Groundwater Monitoring (page 2, center-of-page Table Items MW-1, MW-2 and MW-3) states: "*Detection/Corrective Action*". KWRA respectfully requests that "*Detection/Corrective Action*" should be changed to read: Detection Monitoring; and wells MW-4 and 90-1 should read Background Monitoring.

Response A.7:

See Responses A.3 and A.4.

Comment A.8:

MRP, Second Paragraph on Page 2 also contains the phrase "corrective action wells". KWRA respectfully requests that the above phrase be eliminated because as stated previously the site is not in corrective action.

Response A.8:

See Responses A.3 and A.4.

Comment A.9:

Item 3. Seep Monitoring (page 3 of M&RP No. R5-2014-XXXX). KWRA respectfully requests that the above title be changed to Leachate Seep Monitoring. KWRA also suggests conducting a global document check-and change for these related words (seep monitoring to leachate seep monitoring).

Response A.9:

The requested revisions have been made.

Comment A.10:

B. REPORTING (page 5 of M&RP No. R5-2014-XXXX) Reporting Schedule. KWRA respectfully requests that to be consistent with the latest WDRs for the Hanford Landfill the scheduled reporting dates for items B.1 be changed to read due date 31 August, and 28 February; instead of the current 1 August and 1 February. In addition, Item B.3 currently reads "*Seep Reporting*"; KWRA respectfully request that this be changed to Leachate Seep Reporting.

Response A.10:

The requested revisions have been made.

Comment A.11:

REQUIRED REPORTS (page 6 of M&RP No. R5-2014-XXXX) Item 1. Semiannual Monitoring Reports in part states:..."*are due on 1 August and 1 February*". KWRA respectfully requests that the above scheduled reporting dates be changed to read: are due 31 August, and 28 February; instead of the current 1 August and 1 February.

Response A.11:

The requested revisions have been made.

Comment A.12:

REQUIRED REPORTS (page 8 of M&RP No. R5-2014-XXXX) Item 2. Annual Monitoring Report in part states:..."The Discharger shall submit an Annual Monitoring Report to the Central Valley Water Board by 1 February...". KWRA respectfully requests that the above scheduled reporting date be changed to read: 28 February; instead of the current 1 February.

Response A.12:

The requested revisions have been made.

Comment A.13:

REQUIRED REPORTS (page 9 of M&RP No. R5-2014-XXXX) Item 3. Seep Reporting. In part states... "any seepage". Word seepage is also shown on subitem a) "seepage". KWRA respectfully requests that the word seepage be preceded by the word leachate in both of the above items so that it reads: leachate seepage.

Response A.13:

The requested revisions have been made.