

**Regional Water Quality Control Board
Central Valley Region**

Board Meeting – 7/8 June 2012

**Response to Written Comments on
Tentative Waste Discharge Requirements for**

**City of Redding
Benton Class III Municipal Solid Waste Landfill**

18 April 2012

At a public hearing scheduled for 7/8 June 2012, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements for the Benton Class III Municipal Solid Waste Landfill. This document contains responses to written comments received from interested parties in response to the Tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board by 16 April 2012 in order to receive full consideration. Comments were received prior to the deadline from:

1. City of Redding (received 16 April 2012)

Written comments from the above interested party are summarized below, followed by the response of Central Valley Water Board staff.

CITY OF REDDING COMMENTS

CITY OF REDDING – COMMENT #1:

During Phase I construction (of the Benton Airpark Runway Safety Overrun), no extra soil was placed above the foundation layer grades, therefore, no extra soil will be removed. Soil will be excavated, backfilled, and compacted over the Geogrid area, and the linear-low density polyethylene (LLDPE) liner will be installed over the existing overrun subgrade after it is grubbed, graded, smooth-drum rolled, and compaction tested. A geocomposite drainage layer will be installed over the LLDPE, and minimum 18-inches of soil will be placed over the geocomposite and compacted to meet the requirements set forth in the specifications.

RESPONSE:

Finding #9 of the Waste Discharger Requirements (WDR's) has been revised to accurately describe Phase 2 construction with installation of the LLDPE liner and geogrid over the runway safety overrun subgrade.

CITY OF REDDING – COMMENT #2:

Leachate breakouts have not been observed at Benton Landfill in recent years. At most landfill, leachate breakouts are typically observed during the wet season, therefore, L&A recommends (on behalf of the City of Redding) revising Finding #46 to require monthly inspections for leachate breakouts during the wet season.

RESPONSE:

Finding #46 of the WDR's has been revised to require monthly inspections for leachate breakouts during the wet season of October through May.

CITY OF REDDING – COMMENT #3:

Historic groundwater elevation data for the upgradient (background) and downgradient (compliance) wells indicate the direction of the groundwater gradient has consistently been towards the southeast and the toe of the landfill. The older groundwater contour maps that plot water-level data from all the monitoring wells show the direction of groundwater is towards the southeast and the toe of the landfill, which is the same direction and gradient shown on recent groundwater contour maps using just the eight monitoring wells used for semi-annual monitoring. Therefore, quarterly monitoring of all the groundwater wells is not likely to provide any additional information regarding the direction and gradient of groundwater at the site. Semi-annual groundwater measurements would be a more appropriate frequency, and could be performed during the semi-annual monitoring events.

RESPONSE:

Item A.1, first paragraph, page 3 and Table I, Field Parameters, Groundwater Elevation of the Monitoring and Reporting Program (MRP) have been revised to require semiannual groundwater elevation measurements.

CITY OF REDDING – COMMENT #4:

There are no leachate sumps at Benton Landfill, and leachate flow is continuously recorded using a sonic flow meter. L&A recommends (on behalf of the City of Redding) revising the MRP to require monthly flow monitoring of leachate, but not monthly inspections.

RESPONSE:

Item A.2, third paragraph, page 3 of the MRP has been revised to require monthly leachate flow monitoring, while eliminating the requirement for monthly leachate collection and removal system (LCRS) inspections.

CITY OF REDDING – COMMENT #5:

Historic records indicate that leachate has been sampled from the LCRS since August 1991. Since monitoring began, pH values have ranged from 6.01 to 6.90, and EC has ranged from 541 to 1,958 $\mu\text{mhos/cm}$. In the past, leachate at the LCRS has been monitored for field parameters on a semi-annual basis. Increasing the frequency of field-parameter monitoring at the LCRS is not likely to show any new information. Semi-annual monitoring of leachate field parameters would be an appropriate frequency and could be performed during the groundwater monitoring events.

RESPONSE:

Table II of the MRP has been revised to require semiannual monitoring of the Field Parameters pH and EC.