

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 1/2/3 August 2012**

**Response to Written Comments for County of Tulare  
Woodville Municipal Solid Waste Landfill  
Tulare County  
Tentative Waste Discharge Requirements**

---

At a public hearing scheduled for 1/2/3 August 2012, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adopting waste discharge requirements that revise the existing waste discharge requirements to provide for construction of an expansion waste management unit with an engineered alternative composite liner system, closure and postclosure maintenance, and to initiate a corrective action program. This document contains responses to substantive comments received from interested parties regarding the proposed Order circulated on 16 May 2012. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by noon on 16 June 2012 to receive full consideration. Comments were received by the due date from:

1. County of Tulare

The substantive comments are summarized below, followed by Central Valley Water Board staff responses.

---

**COUNTY OF TULARE**

---

- COMMENT:** The Discharger requested that the cost estimate amount to close Units IA, IB, and II in Finding No. 76 of the Tentative waste discharge requirements (WDRs) be revised from \$16,802,010 to \$7,556,190 since the \$16,802,010 amount was based on a more costly previous final cover design than the evapotranspiration final cover design currently included in the Tentative WDRs. Additionally, the Discharger requested that the 2011 balance of the closure fund be revised \$3,867,020.
- RESPONSE:** The cost of constructing an evapotranspiration final cover over Units IA, IB, and II in lieu of the previously proposed engineering alternative final cover will significantly reduce the cost of closure. Therefore, the cost estimate amount of \$7,556,190 appears adequate. The proposed 2011 closure fund balance of \$3,867,020 is based on the closure of Units IA and IB in 2019. The anticipated final closure of Unit II, which has not yet been built, will be in 2045, allowing for the time necessary to increase the balance of the closure fund to \$7,556,190. Finding No. 76 of the Tentative WDRs has been revised as requested.
- COMMENT:** The Discharger noted that the cost estimate amount for postclosure maintenance of Units IA, IB, and II in Finding No. 77 of the Tentative WDRs should be revised from \$1,186,640 to \$6,490,207 since the \$1,186,640 amount was based on a previous postclosure maintenance plan and not the postclosure maintenance plan currently reflected in the Tentative WDRs.
- RESPONSE:** Finding No. 77 of the Tentative WDRs has been revised.

**COMMENT:** The Discharger requested that the 28 September 2012 date for implementing corrective action in Corrective Action Program Specification F.1 of the Tentative WDRs be revised to from 28 September 2012 to 31 December 2012 since more than 60 days would be needed to consult with the Hydrogen Release Compound (HRC) manufacturer, procure the delivery of HRC, and schedule staff/equipment to apply HRC to groundwater.

**RESPONSE:** Corrective Action Program Specification F.1 of the Tentative WDRs has been revised as requested. Additionally, Provision F.7.1 of the Tentative WDRs has been revised to reflect the date of 31 December 2012 for implementing corrective action.

**COMMENT:** The Discharger requested that the information required under Reporting B.1 – B.3 of the Tentative monitoring and reporting program (MRP) be submitted exclusively in a digital format.

**RESPONSE:** The requested revision was not made since the Central Valley Water Board is currently not in a position to handle such information exclusively in a digital format. Therefore, the submission of the information in Reporting B.1– B.3 of the Tentative MRP in paper and digital formats will continue to be required. Raw laboratory data to support the information required by Reporting B.1– B.3 of the Tentative MRP may be submitted solely in a digital format.

**COMMENT:** The Discharger asks whether the requirement for well hydrographs under Required Reports 2.d of the Tentative MRP replaces the requirement for groundwater contour maps that were submitted in semiannual self-monitoring reports.

**RESPONSE:** The intent of Required Reports 2.d was not to replace the requirement for contour maps. Groundwater contour maps are necessary to evaluate groundwater flow directions and gradients within and adjacent to the facility boundaries and will continue to be required in semiannual self-monitoring reports. The Groundwater Monitoring section of the Tentative MRP has been revised to require that groundwater contour maps be included in semiannual self-monitoring reports.

**COMMENT:** The Discharger contends that Items B.2.e and B.2.j under Annual Monitoring Report of the Tentative MRP seem to accomplish the same goal and asks how they are different?

**RESPONSE:** Items B.2.e and B.2.j under Annual Monitoring Report of the Tentative MRP have not been changed. Item B.2.e requires a comprehensive discussion of any corrective action measures (e.g. cover erosion repair, drainage system repair, monitoring well repair or replacement, cover grading, etc.) necessary for the entire facility to maintain compliance with the WDRs. The discussion required by Item B.2.j is specific to the groundwater corrective action program.