





DEPARTMENT OF ENVIRONMENTAL RESOURCES  
Administration

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September 15, 2010

Mr. Howard Hold, P.G.  
Engineering Geologist  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

SUBJECT: Geer Road Landfill, Corrective Action Work Plan due October 31, 2010

Dear Mr. Hold:

As you know, in March 2010 Stanislaus County asked its consultant (SCS Engineers) to update you in writing regarding the corrective action upgrades and activities that were taking place at the Geer Road Landfill. Since that time, the County has diligently proceeded to complete the studies which were necessary prior to the preparation of a Corrective Action Work Plan which is due, pursuant to our Waste Discharge Requirements (WDRs) R5-2009-0051, by October 31, 2010.

As you also know, we met with you and members of your staff on July 8, 2010, and updated you on several aspects of corrective action items that were taking place. One of the specific concerns we discussed during that meeting revolved around the fact that the studies which have been underway seemed to be indicating results that were far different from what was anticipated at the time our WDRs were being revised. These results, which could mean that an updated Groundwater Treatment and Extraction System (GWETS) would be significantly more costly than originally anticipated, may no longer make good economic sense. Consequently, it was pointed out to us during this July 2010 meeting, that a recommended change in corrective action approach would likely trigger another revision of the WDRs in the near future.

County staff met with its consultant on August 20, 2010, to review the completed study data. The results confirmed that an upgraded GWETS would likely involve fewer wells than originally anticipated but at much higher flow volumes, thus drastically increasing the costs for operations and maintenance, treatment, and disposal. At an estimated removal rate of approximately 20 pounds per year at current concentrations, this would equal a cost of roughly \$26,000 per pound of VOC removal. In contrast, the VOC removal by our LFG collection system is roughly 1,600 pounds per year at a significantly lower cost.

Immediately after learning of these results, County staff requested another meeting with Water Board staff, and although a tentative meeting was scheduled for September 9, it was canceled and an alternative date has not yet been successfully scheduled. Given this, Stanislaus County is

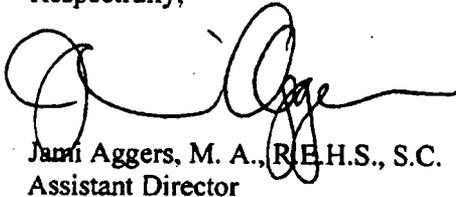
September 15, 2010  
RWQCB  
Page 2

formally requesting an extension of 60 days, to December 31, 2010, for the submittal of its Corrective Action Work Plan. This extension, however, is predicated upon meeting with you and your staff no later than October 1, 2010, so that sufficient time will remain to complete the Plan within the 60-day timeframe. It would also be our expectation that, at that meeting, staff members would be present that would have the authority to opine on whether such an extension could or would be granted. If we do not hear from you by September 30, 2010, we will deem this extension request to be granted.

Another point of note is that during the 2009 WDR revision process, County staff requested additional time in order to evaluate the effectiveness of the 10 additional vadose zone LFG extraction wells that were installed in August 2009 prior to moving forward with additional corrective action because as written, only two semi-annual events would take place before the Corrective Action Work Plan would be due in October 2010. We felt this was insufficient time to fully evaluate the expansion of this corrective action system and we still do, however, this request was not granted. We would also like to revisit this option again with you and your staff.

Thank you for your attention to this matter. I look forward to your response. Please feel free to contact me if you have any questions. My direct line telephone number is (209) 525-6768.

Respectfully,



Jami Aggers, M. A., R.E.H.S., S.C.  
Assistant Director

Cc: Gerry Garcia, DER  
Wayne Pearce, SCS Engineers

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