

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 31 January and 1 February 2013**

**Response to Written Comments for County of Kern
McFarland-Delano Sanitary Landfill
Kern County
Tentative Waste Discharge Requirements**

At a public hearing scheduled 31 January and 1 February 2013, 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 post-closure maintenance and to initiate a corrective action plan. This document contains responses to substantive comments received from interested parties regarding the proposed Order circulated on 24 October 2012. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by noon on 30 November 2012 to receive full consideration. Comments were received by the due date from:

1. County of Kern

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

COUNTY OF KERN

- COMMENT:** The Discharger proposed three new findings for the Waste discharge Requirements that addressed the influence of irrigation water on the water quality of the groundwater beneath the facility, the approval of the Evaluation Monitoring Report and the Engineering Feasibility Study, and the rescission of the Cleanup and Abatement Order.
- RESPONSE:** Finding No. 25 was added to note that irrigation water can recharge groundwater in the vicinity of the facility, Finding No. 39 was added to address the approval of the EMP and the EFS, and Finding No. 5 already states that the CAO has been complied with.
- COMMENT:** Several comments were submitted regarding editorial changes to findings in the Waste Discharge Requirements and requirements in the Monitoring and Reporting Program.
- RESPONSE:** The requested editorial changes in Finding Nos. 2, 27, 44, 45, Attachment B, Monitoring and Reporting Program Section A, Section B.2.f, and Section B.2.h were all made as requested.
- COMMENT:** Monitoring and Reporting Program A.1: The monitoring well network has changed. The table should be revised as follows:

<u>Well</u>	<u>Status</u>
MD1-11	Background
MD1-26	Background
MD1-27	Background
MD1-31	Detection
MD1-32	Detection
MD1-33	Detection
MD3-02	Corrective Action
MD3-06	Corrective Action

RESPONSE: Monitoring and Reporting Program A.1 has been changed as requested.

COMMENT: Monitoring and Reporting Program A.4.d: Standard observations should be conducted monthly throughout the year.

RESPONSE: Monitoring and Reporting Program A.4.d has been changed as requested.

COMMENT: Monitoring and Reporting Program B.1.d: This statement needs clarification.

RESPONSE: In Monitoring and Reporting Program B.1.d, “cumulative tabulated monitoring data” has been changed to “tabulated monitoring data detected during the reporting period”.

COMMENT: Monitoring and Reporting Program B.2.d: We do not believe it is necessary to include all historical monitoring data. Submitting all historical monitoring data in each annual report would be wasteful and cumbersome, particularly the added costs to store the additional paperwork.

RESPONSE: Monitoring and Reporting Program B.2.d requires the Discharger to include all historical monitoring data as a digital file, not as a paper copy. This requirement has not been changed.

COMMENT: Monitoring and Reporting Program B.2.g: We do not believe that updating the concentration limits in our annual monitoring reports is necessary.

RESPONSE: Water quality can change naturally with time. If concentration limits are not updated, monitoring results could become unrepresentative of the actual water quality. Monitoring and Reporting Program B.2.i (now B.2.g) has been changed to read: “Every fifth year, update concentration limits for each monitoring parameter at each monitoring well based on the new data set.”