



# RESOURCE MANAGEMENT AGENCY

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**RECEIVED**

MAR 11 2013

RWQCB-CVR  
FRESNO, CALIF.

March 7, 2013

Mr. Dane Johnson, Senior Engineering Geologist  
California Regional Water Quality Control Board  
Central Valley Region  
1685 E Street  
Fresno, CA 93706

**RE: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS, BALANCE  
ROCK LANDFILL, TULARE COUNTY**

Dear Mr. Johnson:

This letter is in response to the Tentative Waste Discharge Requirements (WDRs) for the Balance Rock Municipal Solid Waste Landfill received by this office, dated 8 February 2013. In the accompanying Notice of Public Hearing, it is stated that any comments or recommendations concerning the tentative WDRs should be submitted to your office in writing by noon on 12 March 2013. Staff from the Tulare County Resource Management Agency Solid Waste Division, have reviewed the Tentative WDRs and have the following comments:

**Waste Discharge Requirements:**

**Finding 21** states in pertinent part: *"The first encountered groundwater occurs...at depths currently ranging between 6 and 65 feet ..."*

A review of the groundwater elevation data contained in the first semi-annual self monitoring report (SMR) for 2012 at Balance Rock indicates that the depth to first encountered groundwater ranged between 12 and 72 feet below ground surface. These measurements were taken at groundwater monitoring wells M-8 and M-4 respectively on 23 April 2012.

Please correct the finding accordingly.

**Finding 33** states in pertinent part: *"Volatile organic compounds...detected in groundwater are benzene, Chlorobenzene, vinyl chloride, PCE..."*

In reviewing the history of volatile organic compound (VOC) detections at the Balance Rock landfill, vinyl chloride has only been detected in trace amounts.

Please remove vinyl chloride from the list of VOC detections in the finding.

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**Finding 45** states in pertinent part: *“The ...final cover will be monitored for ...damage and defects...by monitoring surface emissions...”*.

Surface emissions are not monitored at the Balance Rock landfill. Two moisture sensors were installed below the geosynthetic clay liner (GCL) to detect damage or defects in the final cover system as approved in the Final Closure Plan/Postclosure Maintenance Plan for the Balance Rock landfill.

Please remove the reference to monitoring surface emissions and change the finding accordingly.

### **Corrective Action Specifications**

**Specification 2.:** The requirements of this specification were addressed in the approved workplan dated 27 May 2008.

Please omit this specification from the Corrective Action Specifications as well as Corrective Action Task A.3. [sic].

**Specification 3.:** This specification states in pertinent part, *“By 30 May 2014, the Discharger shall submit a preliminary...report that evaluates the CaSx by-product impacts...”*.

Corrective action specification 1 requires that the County implement a CAP by 30 November 2013 however that is not necessarily the date that the CaSx will be injected. Finding 39 states in pertinent part, *“The Discharger proposes to submit a preliminary assessment report one year after the initial injection of CaSx...”*. Should the CaSx be injected by 30 November 2013, the 30 May 2014 preliminary assessment report would be due in 6 months and not the one year stated in Finding 39.

Please remove the the date at the beginning of Corrective Action Specification 3 to read in pertinent part, *“One year after injection of CaSx...”*. At a minimum, the date at the beginning of Specification 3 should be changed to 30 November 2014 to allow one year from the implementation of the CAP. Appropriate changes also need to be made to Corrective Action Task A.3. (second occurrence).

**Specification 5.:** This specification states in pertinent part, *“By 28 February 2018, ...”*.

Please change this date to 30 June 2018 to allow for a round of groundwater sampling during the first semi-annual period of 2018.

### **Monitoring and Reporting Program**

**Corrective Action Task List** (MRP page 15): Please change the number of the first task following Task 1 to read Task “2.”.

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**Monitoring and Reporting Program (continued)**

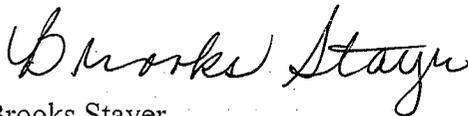
**Table IV** (page 19): Cyanide and Sulfide listed at the beginning of the table appear to belong at the bottom of the previous Table III.

Please move the heading for this table as appropriate so as to include Cyanide and Sulfide in Table III.

**Information Sheet:** Please make the above changes as appropriate to the Information Sheet.

We appreciate the opportunity to comment on the Tentative Waste Discharge Requirements for the Balance Rock Landfill. If you have any questions or need clarification on any of our comments, please feel free to contact me at (559) 624-7190 .

Sincerely,



Brooks Stayer  
Solid Waste Manager

cc: Joy Isaacson, CalRecycle  
Ken Bowers, Tulare County HHSA-Environmental Health Division