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March 14, 2021

"Transmitted Electronically"

Mrs. Kristen Gomes, P.E.
Water Resource Control Engineer
California Regional Water Quality Control Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706

RE: Tentative Waste Discharge Requirements (WDRs)
Kern County Public Works Department Comments
Bakersfield Metropolitan (BENA) Sanitary Landfill
Kern County, California
WDID No. 5D150303030

Dear Mrs. Gomes:

Attached to this Cover Letter is the Summary of Comments from the Kern County Public Works Department on the Tentative Waste Discharge Requirements (WDRs) for the Bakersfield Metropolitan (BENA) Sanitary Landfill. Also attached along with this Cover Letter is the Bena WDR PDF Comments Supporting Document, which contains the same comments that can be found in the Summary of Comments.

Both the Summary of Comments and the Bena WDR PDF Comments Supporting Document will be uploaded to GeoTracker on March 15, 2021.

If you have any questions, please do not hesitate to contact me at (661) 862-8895.

Sincerely,



Jeff Davis, P.E.
Engineering Manager

Bakersfield Metropolitan (BENA) Sanitary Landfill – Tentative Waste Discharge Requirements (WDRs)

March 14, 2021

Kern County Public Works Department (Department) Summary of Comments

Comment #1 (Page 1; Introduction; Finding No. 3; Table 1; Second Row)

In Table 1 – Summary of Waste Management Units (WMUs) Permitted under Order, is the size (86 acres) of Phase 2A accurate? WDR R5-2007-0092 describes 2A as being 175 acres.

Comment #2 (Page 3; Waste Classification & Permitting; Finding No. 13)

Water injection did not cease in November 2014 due to increasing surface emissions of landfill gas. Water injection ceased in November 2013 to address localized subsidence on the top deck and evaluate continuance of the program.

Comment #3 (Page 4; Alternative Daily Cover; Finding No. 18)

For alternative daily cover (ADC), please add compost to the approved list as an option for use as it is included in our October 2020 JTD (which is referenced in the WDRs).

Comment #4 (Page 6; Monitoring Networks; Finding No. 34; Table 2; Third Row)

In Table 2 – Groundwater Monitoring Well Network, well BE1-04 is historically dry. The pump was removed from the well in 2019 to simplify the quarterly checks for recharge and elevation measurements.

Comment #5 (Page 7; Monitoring Networks; Finding No. 35; Table 3)

In Table 3 – Unsaturated Zone Monitoring Network, the table does not include several monitoring points for Phase 1 and omits the entire perimeter LFG monitoring network for Phase 2A. WDRs R5-2007-0092 were issued prior to the addition of several PM wells constructed to comply with changes to Title 27. The vadose detection monitoring gas wells not included in Table 3 of the WDRs are listed below:

- BE1-22
- BE1-24
- BE1-25
- BE1-26
- BE1-27
- BE1-28
- BE1-29
- BE1-30
- BE1-31
- BE1-32

Additionally, BE1-16 and BE1-17 are in close proximity to each other, much closer than the 1,000' spacing required by Title 27. The Department has designated BE1-17 as the Point of Compliance monitoring point.

Comment #6 (Page 10; Unit Closures; Finding No. 50)

Please update May 2020 to October 2020 to match JTD referenced earlier in WDRs.

Comment #7 (Page 11; Post-Closure Maintenance & Financial Assurances; Finding No. 53; Table 4; Row 3)

The current cost estimate for corrective action is \$793,029 based on June 2020 Annual Inflation Factor worksheets required by CalRecycle. The value presented in the WDRs is from a 2012 Board resolution (the Department can provide the resolution if requested). We are not sure which value the Water Board wishes to use.

Comment #8 (Page 11; California Environmental Quality Act; Finding No. 55)

The Department was surprised not to see anything specific to CEQA for facility operations in the WDRs. The 2007 WDRs has a short description of CEQA as it related to the landfill. If this is needed, please let us know and we can provide a brief summary.

Comment #9 (Page 15; Discharge Specifications; Table 5; Designated Waste)

In Table 5 – Authorized Waste Discharges at Facility, the Department would like to request confirmation that this provision would not allow non-hazardous wastes under variance (i.e. Caltrans projects producing soils with low level TPH/lead) to be accepted? If this is accurate, can the Department please request to alter to include non-hazardous waste as an approved waste type?