



DEPARTMENT OF THE AIR FORCE
30TH SPACE WING (AFSPC)



30 CES/CEVC
806 13th Street, Suite 116
Vandenberg AFB CA 93437-5242

5 October 2004

Mr. Hector Hernandez
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Mr. Hernandez

Please find enclosed our comments on the Regional Water Quality Control Board draft Revised Waste Discharge Requirements Order No. R3-2004-0151 (Order) and Monitoring and Reporting Program No. R3-2004-0151 (MRP) for the Vandenberg AFB Landfill. We appreciate the opportunity to comment on the draft Order and MRP.

If you have any questions or comments concerning this report, please feel free to call me at (805) 605 - 0544.

Sincerely,

Patrick M. Maloy

PATRICK MALOY
Solid Waste Program Manager

Attachments:
Vandenberg Air Force Base Landfill WDR Comments

GUARDIANS OF THE HIGH FRONTIER

"Go Hawks"

Item No. 4 Attachment No. 3
November 19, 2004 Meeting
Vandenberg AFB Class III Landfill
Santa Barbara County

Vandenberg AFB Landfill

Comments on WDR Order No. R3-2004-0151

Page 1, Finding 5 – Please add a fourth bullet for the Report of Waste Discharge Addendum 1 dated 30 June 2004.

Page 2, Finding 8 – The finding states that the landfill will be developed in five phases. The landfill will actually be developed in ten phases based on the latest Fill Sequencing Plan dated 7 March 2003. Please revise accordingly.

Page 2, Finding 10 – The finding lists areas at the landfill reserved for specific types of waste disposal but does not mention C&D debris staging area. The landfill has an area dedicated to C&D debris staging.

Page 2, Finding 12 – non-irrigation should be non-irrigated.

Page 3, Finding 17 – Sentence five indicates, "Concrete and asphalt are also accepted but are relocated to an off-site staging area prior to recycling". Concrete and asphalt are staged and processed on site.

Page 3, Finding 19 – Please update the data listed in the finding to reflect the 2002 disposal characteristics as listed in the Vandenberg AFB Landfill Solid Waste Characterization Report dated April 2003. The approximate percentages of materials received for disposal are as follows: Lompoc Federal Correctional Institute/U.S. Penitentiary – 49%, Vandenberg AFB Military Family Housing - 26%, Vandenberg AFB Industrial/Commercial – 22%, Self-Haul – 3%.

Page 6, Finding 35 – The second sentence indicates precipitation for the 1997-2000 weather year. The weather year should be 1997-1998.

Page 6, Finding 40 – Please remove reference to groundwater collection pond. The pond was removed from service and was demolished in 2000.

Page 19 – The page headers are not consistent with the rest of the WDRs. The WDR No. is the current WDR No. and the date is incorrect.

Comment on MRP No. R3-2004-0151

Page 2, Item B.1 and B.2 – Please remove reporting requirement for volume received and leave weight received. All material entering the facility is weighed, but the volume of material varies depending on density.

Page 3, Item E.1.b, 3rd bullet – Replace reference to Table 2 with Table 4. Table 4 contains the Constituents of Concern, not Table 2.

Page 3, Item F.1.a – The WDR Revisions report submitted by the Air Force dated 15 September 2003 requested the removal of wells 3-MW-3, DM-2, and SSW-MW-1 from the monitoring program. Regional Board staff concurred with this request in a letter to the Air Force dated 28 April 2004. However, the wells are included in the monitoring and reporting program. Please remove wells 3-MW-3, DM-2, and SSW-MW-1 from the monitoring program.

Page 3, Item F.1.a. and F.1.b. – These sections designate monitoring points LT-MW-3 and LT-MW-2 as “Point of Compliance” monitoring points for the alluvial and Monterey formations. These wells are both located north of the slurry wall and therefore do not reflect the quality of groundwater leaving the unit. The water north of the slurry wall is pumped to the Groundwater Reclamation and Conditioning System for treatment. The Air Force requests that these wells be considered monitoring points rather than points of compliance.

Page 3, Item F.1.b. – Background well MFB-MW-1 is located within the Subtitle D footprint and therefore should not be considered a background well. The Air Force proposes locating a background well using information obtained from planned groundwater modeling. This will allow the proper placement of the well for the purpose of evaluating background water quality.

Page 3, Item F.2, 3rd sentence – The drainage routes are located along the northern and western boundary. Please replace “northern and eastern” boundary with “northern and western”.

Page 4, Item G.2 – Please clarify that quarterly surface water monitoring will only be required when sufficient surface water is available for sampling.

Page 9, Item C, Records to be Maintained – The MRP indicates that the Base is required to retain records for the life of the facility. The facility’s estimated closure date is over 80 years from now, including the 30 year post-closure period there is a potential for the base to have to maintain records for 120 years. The Air Force requests that records maintenance be limited to 30 years.