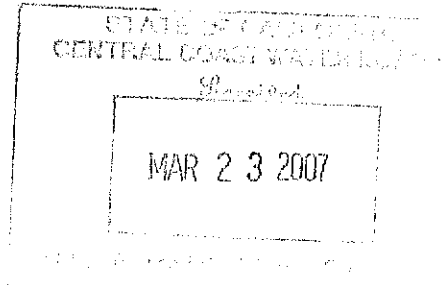


COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT
123 East Anapamu Street
Santa Barbara, California 93101
805\568-3000 FAX 805\568-3019



PHILLIP M. DEMERY
Director



March 22, 2007

Martin Fletcher
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

**SUBJECT: COMMENTS TO DRAFT WASTE DISCHARGE REQUIREMENTS R3-2007-0027,
MONITORING & REPORTING PROGRAM R3-2007-0027 FOR FOXEN CANYON
CLOSED CLASS III LANDFILL**

Dear Mr. Fletcher:

The County of Santa Barbara Public Works Department Resource Recovery & Waste Management Division appreciates the California Regional Water Quality Control Board - Central Coast Region providing us the opportunity to review and comment on the subject. We have the following comments on:

- Draft Waste Discharge Requirements Order No. R3-2007-0027
- Draft Monitoring and Reporting Program No. R3-2007-0027

Comment #1

Waste Discharge Requirements (WDRs) Page 1 Landfill Owner and Location #3.

The Landfill is located in Section 10 and 15, **Township 7** North, Range 31 West, rather than Section 10 and 15, Township, Range 31 West.

Comment #2

WDRs Page 1 Classification and Waste Type #8, fourth sentence.
Tile should be **Title**.

Comment #3

WDRs Page 2 Landfill Description and History #14.

The method of discharge at the Landfill **was** area fill

Comment #4

WDRs Page 4 Surface Water and Groundwater #29, eleventh sentence.
.... regularly **detected** in LY2

Comment #5

WDRs Page 6 C. Specifications #5.

Condensate or leachate **handlings-systems** shall:

Project 139906
AA/EEO Employer
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Item No. 11 Attachment No. 4
September 7, 2007 Meeting
Foxen Canyon Closed Landfill

Mr. Martin Fletcher
SUBJECT: COMMENTS TO DRAFT WASTE DISCHARGE REQUIREMENTS R3-2007-0027, MONITORING & REPORTING
PROGRAM R3-2007-0027 FOR FOXEN CANYON CLOSED CLASS III LANDFILL

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Page 2

Comment #6

WDRs general comment.

Within the WDRs, the Regional Water Quality Control Board is referred to as Water Board and Regional Board. For consistency, we recommend Regional Board as presented on the heading on Page 1.

Comment #7

Monitoring and Reporting Program (MRP) Page 2 E. Evapotranspirative Cover Performance Monitoring
The design basis for the evapotranspirative cover adequately demonstrates performance superior to the California Code of Regulations (CCR) Title 27 prescribed final cover. Five years of soil moisture monitoring and modeling of moisture conditions in the cover after placement on the landfill will serve no practical purpose and will not provide the intended empirical demonstration of percolation through the cover system. Collection of this array of data is likely to lead to equivocal interpretations and will be costly and time consuming to both the Santa Barbara County and RWQCB. It is the position of Santa Barbara County that the merits of the alternative cover be based on design studies, infiltration modeling using site specific climatic data and soil properties, borrow source investigations, and construction quality assurance procedures, which have been previously submitted to and approved by the RWQCB in accordance with CCR Title 27, Section 21090.

In this regard, it is suggested that Part I. E. items 1, 2, and 5; and part III. A. 5. should be omitted from this MRP.

Comment #8

MRP Page 3 E.4. Soil Profile Data

Annual destructive testing of the final cover is counter-productive in that this practice will compromise the function of the evapotranspirative cover by disturbing the vegetation growing on the cover, interrupt the pedogenesis (evolution of a productive soil horizon), and disrupt the compacted placement of the cover soils. The following is suggested wording for this item:

Soil Profile Data – On an annual basis, visually inspect the cover over at least three transects and describe the surface soil conditions, including any evidence of preferential pathways for percolation of moisture.

Comment #9

MRP Page 3 E.5. Runoff

We suggest omitting this item because measurement of runoff using a weir and automated logging device will not be useful in calculating a water balance to determine percolation through the cover because of run-on and runoff entering the weir from adjacent areas of the site which are not components of the landfill cover. The site drainage system was previously designed and approved as part of the Closure Plan and this system is currently contracted and under construction.

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Page 3

Comment #10

MRP Page 3 H. Analytical Monitoring and Monitoring Locations #1. Groundwater and Surface Water Monitoring Parameters.

This section should apply to groundwater monitoring only. Storm water monitoring frequency and monitoring parameters are included in Section G. Since the WDRs and MRP are for the Foxen Canyon Landfill following closure, and no waste material will be exposed to rainfall, the chances of an impact to surface water for the parameters listed in Table 2 will be limited. We recommend that this section be revised to include groundwater monitoring only.

Comment #11

MRP Page 3 H.1. Groundwater and Surface Water Monitoring Parameters:

In the second sentence, the Attachment should be 2 not 3 when referring to monitoring point locations.

Comment #12

MRP Page 4 H. Analytical Monitoring and Monitoring Locations #3 Constituents of Concern (COC).

This section includes the requirement to perform COC analysis on surface water. Since the WDRs and MRP are for the Foxen Canyon Landfill following closure, and no waste material will be exposed to rainfall, the chances of an impact to surface water for the parameters listed in Table 3 will be limited. We recommend that this section be revised to include groundwater monitoring only.

Comment #13

Table 1 Monitoring Points. Per our comments in Comment #10 and Comment #11, we request that surface water monitoring be conducted in accordance with the NPDES program as included in Section G of the MRP.

Comment #14

Table 1 Monitoring Points. Section H.1. Groundwater and Surface Water Monitoring Parameters.

This section lists the frequency of groundwater monitoring as semiannual while Table 1 lists it as quarterly. We recommend that groundwater monitoring at the Foxen Canyon Landfill be performed semiannually consistent with the current monitoring frequency. We also request that the frequency of monitoring not be for a specific month, but be conducted during the monitoring period. If you concur with our recommendation on semiannual monitoring, the actual quarter of monitoring could be specified as with the monitoring and reporting programs for the Ballard Canyon/Chalk Hill Road and Santa Ynez Airport Landfills. This would allow the County the flexibility to schedule our technicians for not only the ground water monitoring, but other tasks that they perform.

We question the inclusion of all of the sites groundwater monitoring wells in corrective action and recommend that MW3, MW4 and MW8 be placed in detection monitoring. Since the commencement of operation of the landfill gas collection system in 1997/98, the detection of volatile organic compounds in MW3, MW4 and MW8 has decreased to the point that the analytical results are non-detect, or an occasional detection of a single compound which has been reported as trace. We concur with the requirement to place MW9 and MW10 in corrective action and that monitoring of the wells be conducted quarterly.

AA/EEO Employer

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Comment #15

Table 2 Monitoring Parameters.

For the USEPA Method for Chemical Oxygen Demand, we recommend EPA Method 410.1.

Comment #16

Table 3 Constituents of Concern footnote 3.

This should be 1,4-Dioxane rather than 1.4 dioxane.

Comment #17

Table 4 Landfill Gas Monitoring Parameters.

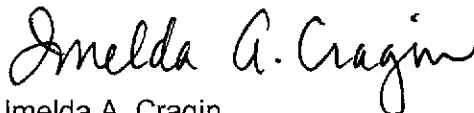
The units for VOCs are parts per million by volume (ppmv).

Comment #18

Attachment 2 shows MW6. This well was destroyed as part of the closure of the Foxen Canyon Landfill. MW6 had been dry since installation.

We again thank you for the opportunity to review and comment on the Draft of the WDRs and MRP. Please contact me at 882-3613, if you have any questions regarding our comments.

Sincerely,



Imelda A. Cragin
Permitting & Engineering Manager

cc: Mark Schleich, Public Works
John Robertson, CRWQCB

G:\SWGROUPE\GROUP\ENGINEER\FOXEN\RWQCB\Draft WDRS and M&RP.doc

AA/EEO Employer

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