

Regional Water Quality Control Board  
Central Valley Region

Response to Written Comments for  
Tentative Waste Discharge Requirements  
for  
County of Kern  
Arvin Sanitary Landfill, Kern County

This document contains the responses to written comments received from interested parties regarding the proposed tentative Waste Discharge Requirements (WDRs) for the County of Kern (County), Arvin Sanitary Landfill, Kern County for post-closure maintenance and corrective action. The Tentative WDRs, R5-2021-XXXX, were prepared to update as part of a policy of administrative review. Currently, WDRs Order R5-2010-0086 regulate the facility.

The Tentative WDRs were circulated on 3 August 2021 for public comment, ending on 3 September 2021. A total of one letter/email was received and these comments are addressed below.

Comments submitted during the comment period were received from the following:

- A. Jeff Davis, County of Kern, 1 September 2021

## **RESPONSE TO COMMENTS**

### **Comment A.1:**

Comment #1 (Monitoring & Reporting Program; Page 2 & 3; Corrective Action and Detection Monitoring Program (DMP); Table 1) - Groundwater monitoring wells AR1-05, AR1-24, and AR1-28 are going dry. Kern County Public Works Department (KCPWD) is planning to decommission these wells and install replacement monitoring wells. KCPWD has requested a proposal from our consultant to do the Work Plan to decommission the wells and install the replacement wells. KCPWD will submit the Work Plan to the Water Board when it has been prepared by the consultant.

#### **Response A.1:**

Comment noted.

### **Comment A.2:**

Comment #2 (Monitoring & Reporting Program; Page 3; Corrective Action and Detection Monitoring Program (DMP); Table 1) - Corrective Action Program (CAP) wells AR2-01 and AR2-02 have dewatered. AR2-03 and AR2-07 are projected to be dry within 2 years. AR2-07 is the only one of these wells with detections.

#### **Response A.2:**

Comment noted. A work plan to replace dry wells will need to be submitted for review and approval.

**Comment A.3:**

Comment #3 (Monitoring & Reporting Program; Page 4; Corrective Action and Detection Monitoring Program (DMP); Table 3) - Program (DMP); Table 3) Nitrate is not listed as a constituent parameter in Table 3. We recommend Nitrate be added to Table 3.

**Response A.3:**

The recommended revision will be made.

**Comment A.4:**

Comment #4 (Waste Discharge Requirements Order; Page 2; Introduction; Finding No. 8) - The abandoned, non-hazardous oil field waste processing facility was located on a five-acre parcel within the southwest corner of the Facility.

**Response A.4:**

Finding No. 8 will be revised as follow: Previously, an abandoned, non-hazardous oil field waste processing facility was located on a five-acre parcel within the southwest corner of the Facility.

**Comment A.5:**

Comment #5 (Waste Discharge Requirements Order; Page 3; Waste Classification & Permitting; Finding No. 12) - For closed landfills, the document is not titled a JTD (only active sites have this designation). Final Post-Closure Maintenance Plan is the term that should be used. The term is used later in the document (bullet 36). We recommend updating this section.

**Response A.5:**

The recommended revision will be made.

**Comment A.6:**

Comment #6 (Waste Discharge Requirements Order; Page 3; Site Conditions; Finding No. 17) - First encountered groundwater ranges between 78 to 85 feet beneath the WMU to 96 feet in the CAP wells beyond the facility perimeter.

**Response A.6:**

Finding No. 17 will be revised as follow: Groundwater underneath the Facility is first encountered between approximately 78 and 85 feet below ground surface (bgs) and to 96 bgs in the CAP wells beyond the Facility.

**Comment A.7:**

Comment #7 (Waste Discharge Requirements Order; Page 3; Site Conditions; Finding No. 18) - The elevation of first encountered groundwater does not typically fluctuate but the groundwater is declining at a rate of 1 to 2 feet per year. The deeper aquifer does show some seasonality.

**Response A.7:**

The recommended revision will be made.

**Comment A.8:**

Comment #8 (Waste Discharge Requirements Order; Page 16; Attachment A – Site Location Map) - The property boundary is incorrect. Please see the attached Arvin Sanitary Landfill property boundary maps.

**Response A.8:**

The recommended revision will be made.

**Comment A.9:**

Comment #9 (Waste Discharge Requirements Order; Page 17; Attachment B – Site Map) - Property boundary is incorrect. Please see the attached Arvin Sanitary Landfill property boundary maps. Also, the VenVirotek note should perhaps say “Former VenVirotek Area”.

**Response A.9:**

The recommended revision will be made.

**Comment A.10:**

Comment #10 (Waste Discharge Requirements Order; Page 19; Standard Provisions & Reporting Requirements; Terms and Conditions; #3) - For closed landfills, the document is not titled a JTD (only active sites have this designation). Final Post-Closure Maintenance Plan is the term that should be used. We recommend updating this section.

**Response A.10:**

Recommended vision will not be made, as Standard Provisions & Reporting Requirements are a Board-adopted document.

**Comment A.11:**

Comment #11 (Waste Discharge Requirements Order; Page 52; Information Sheet) - For closed landfills, the document is not titled a JTD (only active sites have this designation) Final Post-Closure Maintenance Plan is the term that should be used. We recommend updating this section.

**Response A.11:**

The recommended revision will be made.

**Comment A.12:**

Comment #12 (Waste Discharge Requirements Order; Page 52; Information Sheet) - The abandoned, non-hazardous oil field waste processing facility was located on a five-acre parcel within the southwest corner of the Facility.

**Response A.12:**

The Information Sheet will be revised as follow: An abandoned, non-hazardous oil field waste processing facility was previously located on a five-acre parcel within the southwest corner of the Facility.