



North Coast Regional Water Quality Control Board

March 24, 2021

Mr. Alex Straessle
County of Mendocino
Department of Transportation
340 Lake Mendocino Drive
Ukiah, CA 95482-9432
straessa@mendocinocounty.org

Dear Mr. Straessle:

Subject: North Coast Regional Water Quality Control Board (Regional Water Board)
Comments on 2006 Joint Technical Documents - Remediation of Final Cover,
2020 Report of Waste Discharge, and First Half 2020 Monitoring Report

File: Laytonville Solid Waste Disposal Site (SWDS), Laytonville, CA 95454
WDID 1B750500MEN

The Joint Technical Documents and Report of Waste Discharge are incomplete. Regional Water Board staff have reviewed the subject documents and have the following preliminary comments.

1. The 2020 Report of Waste Discharge (ROWD) indicates that the County of Mendocino proposes a design change to the SWDS consisting of replacing sloped sections of the Geosynthetic Clay Liner (GCL) with a compacted clay cap. The ROWD also proposes grading, drainage, leachate collection, and monitoring design changes to the landfill. The proposed design changes are documented in the 2006 Joint Technical Documents. We note the cost estimates and financial assurance review contained within the Joint Technical Documents are over 15 years old.

The ROWD contains a letter dated March 21, 2007, from Bryan A. Stirrat & Associates responding to a letter dated May 13, 2005, from Regional Water Board staff regarding an earlier version of the Joint Technical Documents. The March 2007 letter responds to 43 comments from Regional Water Board staff regarding project design and regulatory compliance including: 1) compliance with applicable requirements contained in title 40 of the Code of Federal Regulations (40 CFR) and title 27 of the California Code of Regulations (27 CCR);

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2) a complete list of interested parties; 3) verification of existing conditions; 4) construction of leachate monitoring/extraction wells; 5) updated financial assurance review; and 6) reference to current regulatory orders, e.g. monitoring and reporting program and waste discharge requirements.

The Joint Technical Documents and Report of Waste Discharge need to be updated to include the following:

- a. Verification of compliance with current requirements of 40 CFR and 27 CCR
 - b. Current construction and maintenance cost estimates and financial assurance review
 - c. Verification of existing site conditions as relevant to the proposed design changes including: i) foundation layer thickness and relative compaction; ii) condition of and remaining design life of the GCL panels proposed to remain in place; iii) existing topography; iv) proposed borrow site soil quality/quantity; and v) groundwater gradient.
 - d. Proposed closure implementation schedule
 - e. Current list of interested parties
 - f. Final signed/stamped Engineering Plans and Specifications
 - g. Designation of Construction Quality Assurance Officer
 - h. Leachate extraction/monitoring well design details
2. Monitoring and Reporting Program Order R1-2018-0059 (MRP) states that the Laytonville SWDS is currently in corrective action because groundwater contamination has been detected. The First Half 2020 Monitoring Report includes statistical analysis of groundwater data. Starting in about 2017, corrective action well 93-2 records intra-well exceedances of the upper predictive limit for more than 10 general chemistry indicator parameters and in general, well 93-2 records increasing trends in several indicator parameters since around 2011. The results from well 93-2 trigger requirement No. 10 of the Monitoring and Reporting Program – Detection of Release. These requirements are listed below.

Immediately following detection of a release, or after completion of the retest, the Discharger:

a. Shall immediately sample all monitoring points in the affected medium at the WMUs and determine the concentration of all COCs. Because this COC scan does not involve statistical testing, the Discharger need collect and analyze only a single water sample from each monitoring point in the affected medium. The Regional Water Board can approve an appropriate subset of monitoring points to be sampled for all COCs, based upon the hydrogeologic conditions at the WMU. [Cal. Code Regs., title 27, § 20420(k)(1)]

b. Within 90 days of determining measurably significant evidence of release, submit an amended ROWD to establish an evaluation monitoring program, in accordance with California Code of Regulations, title 27, section 20420(k)(5)c.

Within 180 days of verifying measurably significant evidence of a release from a WMU, submit an engineering feasibility study for a corrective action program. The corrective action program shall, at a minimum, meet the requirements of California Code of Regulations, title 27, section 20430. [Cal. Code Regs., title 27, § 20420(k)(6)]

3. Beginning while the landfill was in operation and periodically since landfill closure, several studies (including geophysical surveys, soil gas surveys, and groundwater monitoring) have been performed on behalf of the Cahto Tribe of Laytonville Rancheria in the vicinity of the landfill. The site conceptual model for the SWDS indicates a northerly groundwater gradient within two principal groundwater zones. Well 93-2 is located in the southeasterly quadrant of the landfill property, topographically higher than residential areas on the Laytonville Rancheria and records an increasing trend in general indicator parameters suggesting potential variability in groundwater gradient.
4. We understand the Cahto Tribe in May 2020, initiated a government-to-government consultation with the CalEPA and is in the process of forming a Technical Work Group to address the Tribes' concerns regarding the landfill through a review of available data. CalEPA's technical review process is anticipated to complete the second or third quarter of this year.

Please provide a schedule for submitting an updated Report of Waste Discharge and Joint Technical Documents Package and addressing requirement No.10 of the MRP. Please contact me to schedule a phone call or meeting to discuss any questions or concerns at chris.watt@waterboards.ca.gov.

Sincerely,

Christopher Watt, CHG, CEG
Senior Engineering Geologist

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