



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
ALAN WEAVER, DIRECTOR

July 11, 2007

Mr. Peter Bailey, R.G.
Department of Toxic Substances Control
Hazardous Waste Management Program, Land Disposal
8800 Cal Center Drive
Sacramento, CA 95826-3200

2007 JUL 12 AM 9:13

Dear Mr. Bailey:

SUBJECT: Comment Resolution Letter for Second Notice of Deficiency, Post-Closure Application, Blue Hills Disposal Facility, Fresno, California

Enclosed herewith are three sets of revised pages to be inserted into the previously supplied Permit Application.

- In Part A, remove the Title Page and replace it with the July 2007 Title Page.
- Replace the "Hazardous Waste Permit Information Form" (page 1 of 6) with the form that lists the Waste Discharge Requirements.
- Replace complete Part B in all three original applications. The new Part B Title Page is dated July 2007.
- Remove all of the tables in Appendix E and replace with the new Table E-10 and E-11.
- Remove Drawings 2 and 3 from the three original Permit Applications and replace them with corrected Drawings 2 and 3.

The following is a description of the changes made to the Blue Hills Disposal Facility Post-Closure Permit application as a result of comments made in a letter to Fresno County dated March 14, 2007, from the Department of Toxic Substance Control (DTSC). The comment appears first followed by the Fresno County response.

1. Waste Management Unit (WMU) boundaries on Drawings 2 and 3 are different than other submitted figures, such as the WMUs in the Groundwater Monitoring Reports. For example, the geometry of Drawing 2 in the Part B Application shows WMU-3 extending northwesterly from the access road to a line drawn of the 2006 Groundwater Monitoring Report. However, it shows the same WMU-3 boundary

RESOURCES DIVISION

Mr. Peter Bailey, R.G.
July 11, 2007
Page 2

extending beyond the northwestern boundary of WMU-2 Please submit an accurate topographic map.

Response:

The scale on Drawing 2 and 3 have been corrected and new Drawing copies are supplied in this package. The Waste Management Unit boundaries have been corrected using survey data from the Closure Certification Report. The corrected boundaries are reflected on Drawings 2 and 3. Please remove the Drawing with the incorrect scale. Insert new maps in your copies of the permit package.

2. The scale shown in submitted Drawings are different from scales shown in other submitted figures. For example, the scale shown in Drawing 3 in the Park B Application represents a site width of approximately 625 feet. Figure 2 of the 2nd Quarter 2006 Groundwater Monitoring Report, however, shows the site in an accurate topographic map(s) that comply with CCR Title 22, section 66270.14(b)(18)(A), (C), (D), (F), and (G).

Response:

See response to comment number 1. Also, the map scale in the 2nd quarter 2006 Groundwater Monitoring Report was incorrect. This error was corrected as of the 3rd quarter 2006 Groundwater Monitoring Report for Blue Hills Disposal Facility.

3. Section 7.2 of the Part B Application states, "Final Cover Certification for the Blue Hills [Landfill] was issued by DTSC in letter..." DTSC does not issue certifications for final covers, but accepts them. Please revise language in Section 7.2 to reflect this.

Response:

Section 7.2, page 11 of the Part B Application was changed to reflect this comment.

4. Section 11.1.2 of the Part B Application states, "An engineered final cover over the WMA was completed in December 1992 and was certified by DTSC in June, 2005." DTSC does not certify final covers, but does accept certifications. Please revise language in Section 11.1.2 to reflect this.

Response:

Section 11.1.2 of the Part B Application page 15 has been changed to reflect this comment.

5. Section 12 of the Part B Application states, "A full scale facility inspection will be immediately scheduled following a reported 5.5 magnitude (Richter scale)

Mr. Peter Bailey, R.G.
July 11, 2007
Page 3

earthquake...” Please revise language in Section 12 to demonstrate that an inspection will be scheduled for earthquakes having a magnitude equal to or greater than 5.5.

Response:

Section 12 of the Part B Application has been changed to reflect this comment. See page 17 in the new Application.

6. The Part B Application lists a current Waste Discharge Requirement (99-087) that is not identified in the Part A application. Please identify all current permits for the facility in section 6 of the Hazardous Waste Permit Information Form in Part A of the Application.

Response:

Waste Discharge Requirement number 99-087 was added to the Part A Hazardous Waste Permit Information Form.

7. Upon completion of the final “Covenant to Restrict Use of Property”, which is enclosed for signature and recording, Fresno shall add language to section 4 (Post-Closure Notices) and 14 (Potential Redevelopment) of the Part B Application that identifies the date that the requirements were met. For example, the third paragraph of Section 4 might read, “Pursuant to 22CCR 66264.119(b)(1)(A) and (B), a recordation for use restricts (“Land Use Covenant”) on the Property was recorded by Fresno County.

Response:

The “Covenant to Restrict Use of Property” was forwarded to DTSC for an authorized signature on June 21, 2007. Upon return to the County, the Covenant will be taken to the Board of Supervisors for their action. Subsequently, it will be recorded by the County.

8. The Groundwater Monitoring item in Table E-11 in the Postclosure Cost Estimate Summary shows \$107,400 projected from year 1 through year 5. Year 6, however, is estimated to be \$53,700 with subsequent year intervals decreasing to \$24,200. There is no basis provided for the decrease in groundwater monitoring costs in the later years. Provide a valid explanation for the decrease in costs or revise the estimate. In addition, there may be other revisions required in the cost estimate related to comments provided by the RWQCB. Costs for quarterly water level measurements, for example, need to be included.

Response:

Based on 13 previous years of experience, Fresno County has modified the groundwater monitoring costs to reflect actual cost. Table E in Part B has been changed to reflect the current cost at Blue Hills.

Mr. Peter Bailey, R.G.
July 11, 2007
Page 4

9. Typical cost estimates for other postclosure sites in California include administrative cost amounting to about 10 to 20 percent of the total estimated cost. Provide an explanation for omitting this item or revise cost estimate.

Response:

The administrative costs are reflected in Table E of the Part B Application.

If you have any questions about the Part A and Part B Application, or the changes made in response to the DTSC comments, please contact Daniel Carlson at (559) 262-4259.

Sincerely,

//original signed by//

Marion L. Miller
Resources Manager

MLM:TC:maw:la
G:\4360Resources\COCKRUM\LETTERS\COMMENTS BLUE HILLS.doc
07/11/07

Enclosures

c: James K. Dowdall, Associate Eng. Geologist, CRWQCB (w/enclosures)
Shelton R. Gray, Senior Eng. Geologist, CRWQCB
Francis J. Coward, Principal Engineer, Department of Public Works and Planning
Daniel Carlson, Senior Engineer, Department of Public Works and Planning