



Department of Toxic Substances Control



Response to Comments

Forward Landfill Waste Management Unit A (WMU-A)

Hazardous Waste Post Closure Facility Permit

June 2016

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PART I. PUBLIC COMMENTS

LEWIS ENGINEERING

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April 7, 2016

Mr. Matthew Mullinax
Office of Permitting
Department of Toxic Substances Control (DTSC)
8800 Cal Center Drive
Sacramento, CA 95826-3200

Dear Mr. Mullinax:

Subject: Forward Landfill, Waste Management Unit A, Hazardous Waste Permit Renewal Application (EPA ID No. CAD 990794133)

On behalf of Forward, Inc. (Forward), Lewis Engineering is submitting the following comments regarding the Draft Hazardous Waste Post-Closure Facility Permit for WMU A at the Forward Landfill in San Joaquin County, California (Draft Permit).

1-1 Part IV. Permitted Units and Activities

LOCATION

The Draft Permit states that WMU-A is located in the northeast corner of the site near the Facility's entrance. The northeast corner of the site is actually approximately 3,000 feet north of WMU-A. We suggest deleting the reference to the northeast corner and stating that WMU-A is on the eastern side of the site near the Facility's entrance.

1-2 Part V. Special Conditions

GROUNDWATER MONITORING CONDITIONS

The statement that barium has consistently been detected at levels above the concentration limits at wells at the point of compliance at least once in a four consecutive quarterly period is incorrect. Based on a review of the past five years of data (2011 through 2015), there have been three barium results measured above a concentration limit, the exceedances were not identified in any one point of compliance well, and none of these results were confirmed by retests. Additionally, the measured barium values have never approached a State Maximum Contaminant Level.

Forward recognizes the need to continue to monitor the water quality associated with WMU-A and recommends preparation of a work plan that provides a path forward to address concentration limit exceedances identified by the monitoring program and subsequent corrective action, if needed, in accordance with regulation. The work plan would include "triggers" for corrective action based on identification of four consecutive confirmed concentration limit exceedances in a single point of compliance well with a statistically increasing trend. When this condition is identified, an engineering feasibility study would be prepared within 180 days followed by corrective action measures as required by regulation (Title 22 §66264.100 et seq.).

1-3 Part VI. Corrective Action

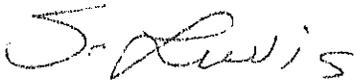
Item 2. To be consistent with the prior permit, Forward requests that the due date for the annual report be changed from February 1 to March 1. Additionally, Forward requests the quarterly reports be provided on May 1, August 1, November 1, and March 1 for the combined fourth quarter and annual report.

1-4 Appendix B

The WMU-A Site Map does not accurately define the landfill site boundary or the WMU-A Unit boundary.

Your assistance with this permit renewal is appreciated. Please note that the new facility contact for the site is Mr. Joseph Lipka. If you have any questions, please call me or Joseph Lipka with Forward at 209.982.4298.

Sincerely,



Sangeeta Lewis, P.E.
Principal, Lewis Engineering

Cc: Kevin Basso, Forward
Lochlin Caffey, Republic Services
Joseph Lipka, Forward
Sarah Battelle, GLA
William Lopez, GLA

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PART II. DTSC RESPONSE TO COMMENTS

Document 1 – Lewis Engineering (April 7, 2016) Comments 1-1 through 1-4

DTSC Response to Comments 1-1 and 1-4:

DTSC Response to Comment 1-1:

DTSC concurs with this revision because it is a necessary component of the site description. DTSC has made the suggested revision in the permit. The revision does not provide any new information that would change the decision for this permit proposal.

DTSC Response to Comment 1-2:

Based upon the comment, DTSC has revised Part V. Page 11, of the permit by the removal of the first sentence of paragraph #1. The revision does not change the decision for this permit proposal.

DTSC Response to Comment 1-3:

DTSC concurs with this revision. DTSC has made the suggested revision in the permit. The revision does not provide any new information that would change the decision for this permit proposal.

DTSC Response to Comment 1-4:

DTSC concurs with this revision. DTSC has made the suggested revision in the permit. The revision does not provide any new information that would change the decision for this permit proposal.