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Comment 16: The Section 2.5 discussion regarding the leachate collection and removal system (LCRS) is incomplete and misleading. The original LCRS stopped operating, and the Discharger determined that the piping system had caved in. The Discharger installed the french drain in order to properly drain the storm water from the east slope because this area was found to be marshy. After installation of the french drain system, the Discharger found that the gas condensate layer was contaminating the storm water, thus requiring that the storm water be contained and disposed of as leachate. The french drain system was not designed nor intended to, nor does it function as, a leachate collection and removal system to drain leachate forming in the waste footprint.

Therefore, at present this site does not have an operating LCRS. The Discharger must install a minimum of two leachate observation/sampling wells to determine whether there is a need to rebuild the landfill's LCRS. The leachate well locations should be based on the direction of flow within the first groundwater aquifer, as well as the topography of the landfill's base. Please submit the proposal for the well installation with the closure plan or as a separate report as part of the JTD/ROWD.

Response: Section 2.5 was written with the understanding that water that comes into contact with landfill wastes must be considered leachate. Accordingly, the resulting mix of landfill gas condensate and surface water runoff was considered to be leachate. Section 2.5 has been revised to clarify the system description.

As requested, the County of Mendocino will install at least 2 leachate extraction wells through refuse. Since the landfill gas wells that are planned for the site will extend through the full thickness of wastes, if leachate is encountered at the base of refuse, provisions will be provided in these wells for removal of both leachate and landfill gas. The landfill gas venting wells will be installed at representative locations throughout the site, and will take into account the pre-development topography of the landfill footprint and groundwater flow directions on the property.