LEA comments on the Draft September 2010 permit application package

ORIGINAL

#	Section	Page	Comment	Response
1	GCL Cover Letter		Should have one verifying the complete submission.	To be provided.
2	BAS Cover Letter	4	Water course alternative permit, should be alteration	Text of letter corrected.
3	Application Form	All	Left side with hole punch, either tab over on electronic form or place into a protective sheet to ensure all the information is intact and readable	Printed new copy which has been inserted into plastic sleeves with hole-punch.
4	Application Part 2 B.1.2	1	Tab over for 1) Physical Address and 2) Lat and Long to make room for hole punch	Printed new copy which has been inserted into plastic sleeves with hole-punch.
5	Application Part 2 B.1.2	1	2) Lat and Long add note that this is for the center of waste footprint	Noted that Lat and Long are for the "approximate center of the project."
6	Application Part 2 B.1.2	1	The latitude and longitude used for the landfill is not consistent with the latitude /longitude used in other	The Lat and Long have been revised to be the same as that reported for the 404 Permit Application.
7	Application Part 2 E.1	1	Agricultural material is not checked; however the JTD lists manure and animal solids as a waste stream accepted for disposal. If this is correct, this box needs to be checked.	Agricultural box is now checked.
8	Application Part 2 E.3	1	Ash box is not checked, the JTD does discuss the acceptance of ash for disposal. This box needs to be checked.	Ash box is now checked.
9	Application Part 2 E.5	1	Compostable Material is not checked as a waste to be received. The JTD does not specifically state that compostable materials will not be received for disposal. If there are any compostable materials received for disposal then this box needs to be checked.	Compostable material is now checked and green material has been specified.
10	Application Part 2 E.8	1	Dead Animals is not marked, however the JTD states that animal solids will be accepted for disposal. This box needs to be checked.	Dead Animals box is now checked.

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11	Application Part 2 E.14	1	The Tires box has been checked, this is specifically for discarded tire castings. The JTD discusses the collection of whole tires at the landfill for further processing and disposal. Note: an additional permit for the storage and processing of the unaltered waste tires may be required by CalRecycle before this activity can begin.	No change proposed. The items in Part 1.E are those received, not necessarily for immediate disposal. Waste tires will be received for processing and subsequent disposal. Additional permits will be obtained as needed prior to initiation of this activity.
12	Application Part 3 B.1.A.2	2	B.1.A.2 -Other would normally include ADC.	No change proposed. This was discussed with LEA several years ago and it was decided to leave it at 0 tons, since this ties to the hard cap on vehicle trips that was based on waste receipts of 5,000 tpd.
13	Application Part 3 B.3.b, c, and e	2	Change in volumes, change to account for cap?	The total site volume (gross) was originally calculated utilizing the contour-cut method with an electronic planimeter (digitizer). The current total site volume has been updated using a CADD grid volume analysis.
14	Application Part 3 B.3.f	2	The instruction for completing the SWFP Application form for Part 3.B.3.f states Date **Of Capacity Information (date)**: The date as of which the remaining and used site capacities in Part 3 were determined. This date may predate the application date by no more than three months. The complete application must include current capacity information.	The date of the capacity information is January 2011. The SWFP application has been revised to reflect this as well as the CD.
15	Application Part 3 B.3.k.2	2	Add an N/A to the blank	N/A has been added to Part 3, B.3.k.2.
16	Application Part 4 A	2	Provide the name and address of the water purveyor or where in the SWFP Application package this information will be located.	The name and address of the San Gabriel Valley Water Company has been added to the application.
17	Application Part 6.A	3	List the relevant attachment for JTD after date September 2010 (Attachment 1) and Mitigation March 2007 (Attachment 3). Include JTD as New September 2010. Under the EIR box include (CEQA Statement included as Attachment 2) and move the Addendums to the addendums line.	Part 6 A of the application has been revised as requested.

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18	Application Part 6.B	3	Closure/Post Closure Maintenance Plan indicate New September 2010. This is a new submission in whole, should not have revisions.	The application now references the September 2010 date only.
19	Application Part 6.C	3	WDR: The WDRs are noted in two places, once in the form of a JTD and second as tentative with attachment SWFP-D-2. These conflict with each other as one is a WDR and the other WDR is a tentative order. Wetlands Permits: indicate which permits are approved, tentative or pending.	Part 6.C references the Report of Waste Discharge (ROWD) which is the technical document which the RWQCB requires; however, current regulations in 27 CCR allow the technical documents for the RWQCB and CalRecyle to be a joint document or Joint Technical Document so reference to the ROWD as the JTD is correct and is not referencing the WDR. The next box is for the WDR which are tentative at this time.
20	Application Part 9	4	Signatures are from 6/24/10 and the application appears to have been received in September. Ensure signatures are for the correct timeline of application submittal.	The signature page has been corrected to include the September date.
21	Exhibit 4.3 - 4A and 4.4-1		Need better maps.	Clean color copies of the Exhibits are provided herein.
22	SWFP Attach D-2	RWQCB	The SWFP application package under review is for a new landfill with a new JTD dated September. The completeness determination letter from RWQCB dated March 1, 2005 for a November 2004 JTD is not valid and should be removed from this application package.	No change proposed. The JTD serves as part of an application for both the SWFP and WDR's. The application for WDR's is not new. The March 1, 2005 completeness letter describes the status of the WDR's, which is the purpose of Attachment SWFP-D.
23	SWFP Attach D	RWQCB	Tentative Order may still be valid, but a workshop has been held and there are both a staff report and public comments on the www. The Permit application must either give a valid status update or list the permit as pending and not address the status.	The SWFP application under Part 6C has been revised to indicate that the WDRs are tentative and pending. The cover sheets in Attachment SWFP-D have been revised to reflect that the WDRs are tentative and pending.
24	SWFP Attach D	SDWA	Same thing as the previous comment, either provide a valid status update with all related correspondence or list as pending.	Revised to indicate this permit application is pending.
25	SWFP Attach D-4	USACOE	Indicate if this application has been approved or is still pending.	Revised to indicate this permit application is pending.

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26	SWFP Attach D-4		The Habitat Restoration and Resource Management Plan is dated October 2008, indicate if this Plan is still applicable or if amended what date(s) amended.	The October 2008 HRRMP is the most recent version, and has not been amended.
27	SWFP Attach D-7	Fire District	The fire district compliance letter provided is dated May 24, 2004; this issue is under review with County Counsel.	Updated fire protection compliance letter provided in Attachment SWFP-D. **Bill I need a copy of this. I CONTACTED JIM SIMMONS TO SEE WHAT HE HAS TO DATE, WE MAY NEED TO JUST PROVIDE THE APPLICATION FOR FIRE SERVICE AS A PLACEHOLDER**
28	Attachment 3A	MM	This may be an old list need to update, and or review and update MM 4.5-7, 4.7-1, 4.11-6A and 4.12-2A	No change proposed. The April 2007 User's Guide reflects the most recent version of the MMRP, which was included in the Revised Final EIR dated March 2007.
29	Attachment 4	Conformance Finding	Should be the most current siting element.	The Siting Element approved by then-CIWMB in 2005 is the most recent version.
30	Attachment 6	Liability Insurance	The certificate(s) of Liability Insurance from Greenwich insurance Company indicate an effective date 6/23/2010, however the certificates were not executed with signatures until 10/12/10. In the privacy statement the agency requesting information is stated as California Integrated Waste Management Board, this needs to be updated to indicate California Department of Resources Recycling and Recovery	No change proposed. The date of the certificate is simply the date it was prepared, the coverage went into effect in 6/23/10. A standard ACORD certificate dated 6/23/10 was provided to LEA, but there was a request to also obtain Form 107 from the carrier(s). Form 107 is a CalRecycle form, and GCL would not be authorized to alter it. Until CalRecycle publishes a new form that deletes the reference to CIWMB, this is the correct form to use to document coverage.
	JTD			
31	JTD Cover		The JTD is new not revised; correct this on the cover page for the JTD.	The cover page is dated September 2010 with no revision date.
32	Table of Contents	i-xxi	Reminder to update page numbers of the contents to correctly correlate to the actual page(s) within the JTD.	The table of contents has been updated.
33	A.5	A.5-1	The Certification of Contents and Affidavits is not signed.	This page is now signed.
34	A.5	A.5-1	The certification from a registered civil engineer or a certified engineering geologist is missing for the preliminary closure/post closure maintenance plan.	The certification from a registered civil engineer for the preliminary closure/post-closure maintenance plan is included in Section E.4 of the JTD.

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35	A.3.4	A.3-2	For unusual occurrences add all the words from 20510(c), missing injury and property damage and rejection of loads.	Section A.3.4 has been revised to include all items in 27 CCR, Section 20510(c).
36	B.1.5.2.1	B.1.6	Waste Types: inert waste such as asphalt and concrete...will be accepted at the landfill. This material may be utilized for the construction of a winter deck and maintenance of the internal roads and drainage control facilities at the landfill. Provide a discussion on how this material will be processed for use at the landfill.	No change proposed. The material will be suitable as received for this use, no processing on site is proposed.
37	B.1.5.2.1	B.1-6	Waste Types: green wastes will be accepted for disposal at the landfill; however they are not identified as a waste stream on the SWFP application.	Green material is now included in Part 2E of the SWFP application.
38	B.1.5.2.2.	B.1-6	Hazardous Wastes: treated wood is a common waste in the CDI waste stream as well as the landscape waste streams, provide a brief discussion if treated wood waste will be accepted at the landfill.	Non-hazardous treated wood waste is classified as solid waste and may be accepted at the GCLF. Hazardous wood waste will not be accepted. Per the EIR, only inert waste that does not contain hazardous waste or soluble pollutants in excess of applicable water quality objectives will be accepted.
39	B.1.5.2.3	B.1.7	Other Waste Requiring Special Handling: Appliances provide a discussion on the process for removal of mercury switches and freon.	Section B.1.5.2 has been revised to include the following sentence: "Any freon and/or mercury switches will be removed from appliances by a licensed contractor prior to disposal at the GCLF."
40	B.1.5.2.3	B.1.7	Other Waste Requiring Special Handling: Provide a better discussion on how large bulky waste such as furniture and appliances will be managed and how these are different from bulky waste used for winter deck construction. The way it currently reads sounds like appliances might be used for winter deck construction.	The last paragraph is Section B.1.5.2.3 has been revised to differentiate between bulky wastes that may be used for the winter deck construction and those that will be disposed in the landfill.

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41	B.1.7	B.1-12	Site Life: 3rd paragraph, 4th sentence states This daily and intermediate cover ratio may be adjusted over time due to the proposed use of synthetic blanket ADC as allowed under 27 CCR Section 20690. The term synthetic blanket is not consistent with B.1.5.4 which uses geosynthetic blankets to describe the ADC. The JTD must be consistent throughout, choose which one you want to use then be consistent. Note: the EIR has "geosynthetic fabric or panel products (blankets)"	The text has been revised to "geosynthetic blankets."
42	B.2.2.1	B.2-1	California Integrated Waste Management Board: Replace this section title with California Department of Resources Recycling and Recovery.	Text h as been corrected.
43	B.2.2.3	B.2-5	Department of Environmental Health: there will be a maintenance area for equipment and vehicles, if you generate any hazardous waste or have hazardous materials in discloseable quantities you also are required to obtain a permit from the Hazardous Materials Division.	The text in Section B.2.2.3 has been revised to reflect the requested information.
44	B.2.2.3	B.2-5	Countywide Integrated Waste Management Plan (CIWMP): the CIWMP was approved by CIWMB so it is appropriate to keep CIWMB listed the two (2) times here and not CalRecycle.	Revised back to CIWMB and added "now known as CalRecycle).
45	Table 5	B.2-6	Change CIWMB to CalRecycle	Corrected
46	B.3.1.5	B.3-6	This section discusses the support facilities and that portable toilets will be used. Portable toilets are not generally approved for use at a permanent facility and the support facilities will be permanent at the landfill. This is supported by the EIR even though it may be inconsistent with normal standards.	Facilities will be temporary (or interim facilities) at the beginning of operations at the GCLF. However, upon completion of permanent facilities, the portable toilets will be replaced with permanent restrooms. Section B.3.1.5 has been revised to reflect this information.
47	B.3.2.22	B.3-8	List which figure the temporary construction yard is located.	The text has been revised to note that the temporary construction year is located on the north side of the San Luis Rey River on the former Lucio Dairy. The Site Map in Figure 2 shows this location (the semi-circular road south of SR 76) and is referenced in Section B.3.1.11.
48	B.4.2.1	B.4-2	Table and discussion is max staff needed. JTD needs to include min staff requirements.	Table 6 has been revised to reflect both minimum and maximum staffing.

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49	B.4.2.1	B.4-2	Table lists 2 personal for Traffic Director/Spotter, however section.3.1.6 states there will be a full-time spotter who will observe unloading activities during all refuse hour of operation. Clarify the wording and make the descriptions consistent.	The text in Section B.3.1.6 has been revised to indicate that a full-time traffic director/spotter will observe unloading activities to correlate with Table 6 in Section B.4.2.1.
50	B.4.2.1	B.4-3	Indicate who will be responsible for the environmental controls such as landfill gas monitoring wells, operational emergency situations and health & safety issues.	Administrative and engineering staff will handle these items. Section B.4.2.1 has been revised to reflect this information.
51	B.4.3.1	B.4-6	Table and discussion is max equip. needed. JTD needs to include min equip. requirements.	Table 7 has been revised to reflect both minimum and maximum equipment requirements.
52	B.4.4.1.1	B.4-7	Excavation/Stockpiling Operations: there is no discussion regarding the excavation or stockpiling in Borrow/Stockpile Area A. Will this area no longer be used during the construction period? However discussion of borrow/stockpile A returns in Part C; ensure consistency throughout the document	No change proposed. Borrow/Stockpile Area A is only used for initial construction, and thereafter at the end of the operating life and for closure. Section B.4.4.1.1 relates to periodic liner construction following initial construction, and for that purpose only Borrow/Stockpile Area B would be utilized.
53	B.4.4.1.1	B.4-7	No discussion of export of rock for sale, change in plan? Has it been removed from all areas. Is in EIR	Rock will not be sold. Will not be discussed in JTD.
54	B.4.4.1.1	B.4-7	This section removed the discussion for the off-site export of excess rock materials. This appears to be in conflict with B.5.3.1 page B.5-38 first paragraph which states... "trucks carrying aggregate off-site...". This indicates that there will be off-site transport of rock materials from the landfill.	Excess rock will not be exported. Section B.5.3.1 has been revised to delete reference to "trucks carrying aggregate off-site..."
55	B.4.4.2	B.4-9	3rd paragraph last sentence states Refuse placed during the working day...covered with soil or ADC, as allowed under 27CCR section 20690(b)(1). Several places in the JTD it states the use of processed green materials (PGM) may also be used as ADC. This section should include PGM as an ADC for consistency throughout the document.	PGM has been added to the text in this section.

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56	B.4.4.2.1	B.4-10	Part of the hazardous waste exclusion plan components listed is Random inspections of incoming loads unless the owner or operator takes other steps to ensure incoming loads do not contain regulated hazardous wastes or PCB waste. This item seems to be in conflict with B.3.2.6 which states the landfill will have a full time spotter that will observe unloading activities during all refuse hours of operation as well as further in this section as part of the Load Checking Program. Provide for consistency throughout the JTD of hazardous waste exclusion activities and personnel usage. Possible clarification is needed to state that a full time spotter is used for hand unloads and load checks are conducted on commercial loads.	"unless the owner or operator takes other steps to ensure incoming loads do not contain regulated hazardous wastes or PCB waste" has been removed from the text to avoid any confusion that load checks will not be performed.
57	B.4.4.2.1	B.4-11	1st paragraph states overpack drums containing hazardous waste will be monitored on a regular basis. This is too vague; provide a time frame for this monitoring such as daily or weekly.	The text has been revised to indicate that the drums will be monitored weekly.
58	B.4.4.2.1	B.4-11	In this same paragraph it is unclear when the hazardous waste will be placed into the over pack containers and who will facilitate this and who will complete the manifests. Provide a more complete paragraph details the storage of and overpacking of the hazardous waste collected at the landfill.	Section B.4.4.2.1 has been revised to indicate that collected on-site hazardous waste will be placed in overpack drums at the time the waste is collected. Prior to shipment off site, site personnel trained in hazardous waste management will overpack and manifest the materials with a licensed hazardous waste hauler/disposer.
59	B.4.4.2.1	B.4-11	Load Checking Program: the 3rd sentence states "As part of the overall HWEP, the operator will also, on regular basis, randomly select a commercial load for a detailed load check. On a regular basis is too vague; provide an estimate of how many load checks will be completed, for example one a day or twice weekly.	Appendix F – Hazardous Waste Exclusion Program indicates that random load checks will be performed weekly. Therefore, the text in Section B.4.4.2.1 has been revised to indicate "weekly."
60	B.4.4.5	B.4-14	"PGM" spell out Processed Green Material first use in doc.	Processed green material (PGM) is spelled out in Section B.4.4.2.

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61	B.4.4.8	B.4-18	Cover Availability: There is an overall shortfall of 4.7 mcy which comes out to around 156,667cy/yr, the JTD states the shortfall can be addressed through the use of ADC, fill sequencing to minimize cover needs, some additional crushing of hard rock and reuse of materials from the demolition of the former dairy facilities. Provide more detail on how these items will make-up this shortfall.	No change proposed. As noted in Section B.4.4.8, a more detailed discussion of soil balance is contained in Section C.2.2.3. The URS report determined that the soil availability assumptions were reasonable.
62	B.4.5.1	B.4-19	Provide information on where the white goods, universal/e-waste, unaltered tires that are removed from the working face will be stored at the landfill.	Section B.4.5.1 has been revised to indicate that these materials will be stored at the site facilities area.
63	B.4.5.3	B.4-19	Removal of Salvaged Goods: Provide information on how long the salvaged goods will be stored prior to shipment off-site for recycling.	The text has been revised to indicate that salvaged goods will be removed once a suitable volume is received to fill a collection vehicle, but in any event not less than every six months.
64	B.4.6.1	B.4-20	Sanitary Facilities: provide information on the sanitary facilities, if any, will be provided near the working face or other locations around the property other than near the ancillary facilities area. This section discusses the use of portable chemical toilets at the ancillary facility area. Portable toilets are not generally approved for use at a permanent facility and the ancillary facility area will be permanent at the landfill. These toilets are allowed for use at/near the working face or other temporary work areas around the landfill since those are ever changing work areas.	The placement of portable toilets near the working face has been added to Section B.4.6.1. Facilities will be temporary (or interim facilities) at the beginning of operations at the GCLF. However, upon completion of permanent facilities, the portable toilets will be replaced with permanent restrooms. Section B4.6.1 has been revised to indicate that permanent restrooms will be installed.
65	B.4.6.3	B.4-20	Consider adding cell phone for communication.	Cell phones have been added to the text.
66	B.4.6.4	B.4-20	Lighting: There is not enough information to ensure compliance with 27CCR 21600(b)(5)(E) Lighting--Describe the locations, numbers, and types of all permanent lighting to assure safety of employees during nighttime operations, if applicable. Portable lighting not covered in EIR.	The lighting stands will be portable so no location can be indicated; however, the text has been revised to indicate that approximately two (2) stands will be utilized.
67	B.5.1.1.2	B.5-2	Deleted dendritic in second paragraph, left it in the fourth paragraph. (last work on page) descriptive but overly technical term.	Dendritic removed from text.

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68	B.5.1.1.2	B.5-2	Last paragraph, provide information on procedures to be used if the flow rate and volume are impacted or the system does become clogged or if the system requires repair.	The collection header under the waste footprint may be accessed through the outfall or cleanouts that will be included in the final design.
69	B.5.1.1.2	B.5-3	Last paragraph second sentence states "the outfall pipe is connected to up to two 10,000 gallon tanks...", this statement is in conflict with C.2.5.4 which states "The outfall pipe will discharge to two 10,000 gallon leachate collection storage tanks..." Will it be up to two storage tanks or will it be two storage tanks, the JTD needs to be consistent throughout.	It will be two storage tanks. The text has been corrected in Section B.5.1.1.2.
70	B.5.1.1.4	B.5-5	Analysis of Potential Impairment to Groundwater: last bullet on second page sentence states "This will provide for substantial capture ...". Provide greater detail to what is considered substantial, 80%, 90% etc.	The text has been revised to indicate "substantial (approximately 90%+) capture..."
71	B.5.1.7	B.5-24	Estimate of Mitigation Costs, what is the date of the estimate for Table 8?	Cost estimate revised January 2011.
72	B.5.1.2	B.5-10	Subdrain System: last paragraph, last sentence of section states "In the unlikely event that there is measureable accumulation of groundwater in the subdrain system collection tank it will be used onsite...", provide information on what activities and where at the landfill this groundwater will be used onsite. Note - Use of collected water not addressed in EIR.	The Tentative WDRs allow spraying of this water on covered areas to reduce immediate dust hazards. Section B.5.1.2 has been revised to reflect this information.
73	B.5.2.3.1	B.5-30	Change "placed approximately 1000 feet" to "less than 1000 feet"	The text has been revised to indicated "less than 1000 feet."
74	B.5.2.3.3	B.5-33	Gas Condensate Collection System: provide a description where the holding tank will be located.	The gas condensate holding tank will be located within the flare station area shown on Figure 11. Section B.5.2.3.3 has been revised to reflect this information.
75	B.5.3.1	B.5-37	3rd paragraph, the use of SDAPCD and APCD are inner mixed, both are the same agency. Pick one title for the agency and use it consistently within this section and the entire document.	Text has been revised to indicate SDAPCD.

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76	B.5.3.1	B.5-38	States trucks carrying aggregate off-site" which indicates that aggregate from landfill will be exported from the landfill. This is in conflict with B.4.4.1.1 page B.4-7 the eliminates the discussion of export of rock from the landfill	This sentence has been deleted since rock will not be exported off-site.
77	B.5.3.2	B.5-38	Vector and Bird Control: states site personnel will inspect area monthly. This seems a long time between inspections to discover any damage, holes or deficiencies created by vectors/rodents/birds, consider inspection every two weeks or even weekly. 2nd paragraph last sentence, consider adding "but are not limited to" to These techniques may include	Monthly has been changed to "bi-weekly". Text has been added as requested.
78	B.5.3.2	B.5-38	Vector and Bird Control:2nd paragraph last sentence, consider adding "but are not limited to" to These techniques may include	Text has been added as requested.
79	B.5.3.5	B.5-40	Fire Protection statement added, may want to take this back out. Issue under review with County Counsel.	No change proposed. Application for service from North County Fire District has been submitted.
80	B.5.3.5	B.5-41	Fire Control; add a statement to which fire agency will be responding in case of a fire. Issue under review with County Counsel.	Text revised to indicate that an application for service from the North County Fire Protection District has been submitted. North County Fire Protection District would enforce the requirements of the 2009 Consolidated Fire Code.
81	B.5.4	B.5-42	2nd paragraph, The western channel is sized to accommodate a rupture of existing Pipelines 1 & 2 and future Pipeline 6 in addition to a 100-year, 24 hour storm event. This is in conflict with C.3.5 page C.3-2 which does not include the rupture of the pipelines as part of the design for the draining conveyance system. Ensure consistency throughout the documents.	No change necessary to this section. C.3.5 has been revised.
82	B.5.5	B.5-43	Traffic Control: 1st bullet states the entrance facilities will be located a sufficient distance to prevent queuing or stacking problems onto SR76. Explain where the sufficient distance is located from. Provide the distance the entrance is located from.	The entrance facilities are located approximately 2,700 feet from SR76; therefore, providing sufficient distance to prevent queuing or stacking problems onto SR76. The text has been revised to reflect this information.

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83	C.2.2.4	C.2-5	Discussion of crossing the aqueduct, but no description of the relocation option.	Text has been revised to indicate that the crossing facilities will not be required if the aqueduct is relocated.
84	C.2.2.4	C.2-6	Stockpile/Borrow Areas: 1st paragraph 3rd sentence the s in basins and areas appears to have been strikethrough. There is more than one basin and borrow/stockpile area, add the s back to these words.	The s has been added back in.
85	C.2.3	C.2-7	Subdrain System: provide information to where the subdrain system eventually flows to for storage prior to treatment on-site or off-site for disposal. To a tank per the EIR.	Text revised to indicate that water from the subdrain would flow to a holding tank in the landfill facilities area. The location of this tank is shown on Figure 8.
86	C.2.5.3.1	C.2-11	Anticipated Leachate Volume: 2nd paragraph uses both HELP3 to describe Hydrologic Evaluation of landfill Performance Version 3. Later in the paragraph this is referred to as just HELP. Be consistent in the use of acronyms throughout the documents.	References to HELP have been revised to HELP3.
87	C.2.5.4.1	C.2-13	Access Risers and Leachate Extraction: 3rd sentence states"...two above ground tanks with a minimum storage capacity of 20,000 gallons". This conflicts with B.5.1.1.2, C.2.5.4 which each indicates a storage capacity of 20,000 gallon. Remove the word "minimum" to ensure storage capacity is consistent throughout the documents.	Text has been removed as requested.
88	C.2.5.5	C.2-13	Alternative use of the leachate will require prior approval ~~be approved~~ by the RWQCB and possibly be APCD.	Text has been revised as requested.
89	C.2.7.2	C.2-15	Landfill Gas System Facilities and Operations: 3rd paragraph last sentence indicates that condensate could be treated on-site or removed off-site for disposal. Provide information on the type, volume and location of the storage container(s) for the condensate.	The condensate will be stored in a dual-wall crosslinked polyethylene tank with a minimum capacity of 3,000 gallons. This tank will be located at the flare station area shown on Figure 11. Section C.2.7.2 has been revised to reflect this information.
90	C.2.7.3	C.2-16	The following wording "notification will be immediately provided to the LEA and a corrective action plan will be provided to the LEA ASAP (see 20937(a)(3)"needs to be added after that statement "when compliance levels are exceeded in any probe"	Text has been revised as requested.

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91	C.2.7.3	C.2-16	1st paragraph 2nd sentence indicates a total of 16 probes will be installed and references Figure 10D. This conflicts with B.5.2.3.1 page B.5-30 which indicates 14 probes will be installed. In addition Figure 10D only shows 14 probe locations. Decide how many probes will be installed (15), at a minimum to meet CCR27 requirements, and ensure consistency throughout the document. **EIR said 15 probes.**	Section C.2.7.3 has been revised to indicate that 14 probes and two temporary probes are proposed.
92	C.2.8.2	C.2-17	Some wording about relocation of the aqueduct is in strikeout, should stay in and change to say if aqueduct relocation is required design of perimeter drains will be re-evaluated and updated.	Text has been revised as suggested.
93	C.2.8.3.1	C.2-18	Last line, Inspection of the buried storm drain pipes will be conducted on a routine basis. Provide a minimum inspection frequency, for example monthly or quarterly, and an inspection method.	The text has been revised to state that inspection of the buried storm drain pipes will be conducted in September, prior to the onset of the stormwater season, and monthly during the stormwater season.
94	C.2.9.1.2	C.2-26	Excavation: The sentence the excavated slopes will have a overall gradient of 2:1 or less than 15 to 20 feet- wide benches located every 40 foot vertical feet does not make sense. Explain how the discussion of the 2:1 gradient is the equivalent to the width of the bench roads every 40 vertical feet.	Added comma to sentence for clarity "...overall gradient of 2:1, or less than 15 to 20 feet-wide benches..."
95	C.2.9.1.2	C.2-27	Excavation: 1st paragraph 1st sentence indicates two stockpile locations. This conflicts with B.4.4.1.1 page B.4-7 which indicates only Stockpile B. Be consistent throughout the document on the number of stockpile areas at the landfill.	No change proposed. This section deals with initial construction, where both stockpiles will be utilized, while Section B.4.4.1.1 deals with future periodic construction, where only Borrow/Stockpile Area B will be utilized.
96	C.2.9.1.4	C.2-28	SWRCB spell out appears to be the first use.	Not the first reference. Previously referenced in Section B.2.2.2.
97	C.2.9.2	C.2-28	Phase 1: Overall provide a discussion on the multiple phases involved in the construction of the landfill, how the initial construction phase differs from the pre-construction phase and the formal landfill construction phase.	Section C.2.9.2.1 has been revised to better describe pre-construction phase and the construction phase.

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98	C.2.9.2.1	C.2-28	Initial construction will include "removal of existing dairy buildings and residences", "removal of manure". Not sure these should be part of the initial construction of the landfill if you want to do any grading or demo prior to being ready to start construction.	These will be part of the pre-construction phase. Section C.2.9.2.1 has been revised to better describe pre-construction phase.
99	C.2.9.2.2	C.2-29	Excavation: the volumes excavated stated in this paragraph conflicts with the volumes stated in B.4.4.1.1 page B.4-7. Ensure consistency throughout the document.	There is no discussion of excavation volumes in Section B.4.4.1.1.
100	C.2.9.2.3	C.2-29	Liner System Development: 2nd paragraph 1st appears to indicate the LCRS will not be installed until the entire liner system has been completed. Likewise the sentence appears to indicate the mainline will not be extended to the sump until the entire liner system has been completed. Re-write this sentence to be more concise.	The text has been revised to clarify the liner and LCRS construction.
101	C.2.9.2.6	C.2-31	Landfill Access Road/Main Haul Road/Bridge: states each slab will be 26 feet wide and 64 feet in length, they will be placed over the pipeline. This conflicts with C.2.2.4 page C.2-5 which indicates the slabs over the pipelines will be 28 feet wide and 40 feet in length. EIR "Each two foot thick slab will be 28 feet wide by 40 feet in length"	The text has been revised in Sec C2.9.2.6, C2.2.4 and B.3.1.1 (approximately 28' x 64' slab dimensions).
102	C.2.9.4.5	C.2-34	Drainage Control Development: 5th sentence states "Once an area reaches 20% of pre-development vegetative condition...". This conflicts with C.2.9.2.5 page C.2-30 and C.2.9.3.5 page C.2-32 which both state 70% pre-development vegetative conditions. Ensure consistency throughout the document. EIR says 70%.	Text has been revised.
103	C.3.5	C.3-2	Drainage System Capacity Requirements: indicates the drainage control feature will control a surface run-off from a 24 hour, 100-year storm event. This is in conflict with B.5.4 page B.5-42 2nd paragraph, The western channel is sized to accommodate a rupture of existing Pipelines 1 & 2 and future Pipeline 6 in addition to a 100-year, 24 hour storm event. Be consistent throughout the document	The text has been revised for consistency.

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104	D.4.7	D.4-22	Rockfall mitigation structure - is discussed and appears to be a valid need, but has not been designed or included in the package.	It is not appropriate to include the design of the rockfall mitigation structures in the JTD. Details as to the design of these systems will be included in the design report required prior to construction of the drainage facilities. This information has been added to Section D.4.7.
105	C.2.9.2.6	C.2-31	Discusses construction over pipeline, need to add the alternative description for the pipeline relocation option.	The text has been revised to indicate that if the aqueduct is moved , the crossing facilities will not be required.
106	C.4.1	C.4-1	Spell out SLRMWD	Text has been added as requested.
107	D.1.3	D.1-2	"South of the river, there are open fields for dairy cows" should be changed to read "former fields" or otherwise reword so that statement is current.	Text has been revised as requested.
108	Table 12B	D.5-3	Missing	Table is now included.
109	D.5.3	D.5-21	Middle of first paragraph delete "to" following 2007.	"From" has been added before 2007 and the "to" is needed as sampling was done until 2009.
110	D.5.4	D.5-21	April 15, 1996, Agreement not included, but the supplement 2004 is as appendix Q. The original is required to be part of the JTD according to the supplement.	The entire agreement is now included in Appendix Q and the text has been revised to reflect this.
111	Closure		There is little discussion on soil quantity estimates and availability, soil is discussed in other areas of the JTD, but no clear discussion of what will be used during operation vs. closure and that onsite soil will be available for closure.	A complete discussion of soil quantities and usage are included in Sections B.1.7 –Site Life and C.2.2.3-Material Availability. Section E.1.3.1.2-Final Cover Design has been revised to reference these sections.
112	E.1.2	E.1-2	The benches will be 20 feet wide; this may conflict with C.2.9.1.2 page C.2-26 which indicates the benches will be 15 to 20 feet wide. Provide information to clarify the final bench roads will be wider that the bench roads used for operational or decide the width of the bench roads and ensure consistently throughout the document.	The text in Section E.1.2 has been changed to correlate with the text in Section C.2.9.1.2 as benches are typically 15 feet wide, but if a bench is utilized as an access road it is typically 20 feet wide. So the range is kept in the text to cover both.
113	E.1.3.1.4	E.1-5	Says soils will be added when existing soil is less than two feet but does not expressly state in this section that the layer is two feet deep.	Section E.1.3.1.4 has been revised to indicate that the foundation layer is to be a minimum two-feet thick.

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114	E.2.8.2	E.2-14	Is it really adequate to correct significant depressions in the cover only once a year? This isn't new material and maybe if is typical and fine, but it doesn't come across to me as saying problems will be fixed when they are found. If the intent is to make it SOP to at least correct the flow with added temporary fill, this should say so.	The text has been revised to add the following: "Significant depressions in the final cover, as observed during routine site inspections, will be promptly repaired with the goal of repairing all depressions prior to the onset of the rainy season (October to April)."
115	E.2.8.2	E.2-14	Agree that the wording is a little vague, should correct problems as they are identified.	See response to comment 115.
116	E.3.5	E.3-3	The reference is to the "local" fire department. Imprecise...	The text has been revised to include the following: "Contact the North County Fire Department, which the GCLF is within the sphere of influence, to provide fire protection, even if on-site capabilities are deemed adequate to extinguish fires or control future explosions."
117	E.3.10	E.3-5	On underground fires. Again, this isn't new but it seems pretty minimal to me, based on some of the County's experiences at Palomar.	The text in Section E.3.10 has been revised to include more detail as to steps to be taken to treat an underground fire.
118	F.1.2	F.1-1	Narrative has closure estimate in 2008 $, table says 2010 $.	The text has been corrected to read 2010.
119	Table 17	F.1-2	Under Item 1 "Foundation Layer 12" thick assumes 12" in place" should say "Foundation Layer 24" thick assumes 12" in place"	Item 1 description has been corrected to 24".
120	Table 17	F.1-2	Under Item 1 "Vegetation Layer" for the Slope is listed in sf, should be cy of soil not a sf number. Under Item 1 "Vegetation Layer" for the Deck is listed as cu, but the number looks like it is the sf number from the composite line above. These should be just the soil component as the vegetation is under item 3.	The unit for the vegetative layer has been corrected to cy. A note has been added to Item No. 1 of Table 17 to indicate that the vegetative layer in this section of the cost is the soil component.
121	Table 17	F.1-2	The numbers need to be rechecked, the math does not work for the first four lines and most of the other I sampled were wrong. Subtotals are also off.	The numbers have all been rechecked. There was a rounding error in the formula which has been corrected and the cost estimate adjusted accordingly. The cost back-up information has also been updated and included in Appendix R.
122	F.1.3	F.1-6	Narrative has estimate in 2008 $, table says 2010 $.	The text has been corrected to read 2010.

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#	Section	Page	Comment	Response
123	Table 18	F.1-7	Item 1 - Costs $10K to install one extra well, but $100K to replace one?	The 100K cost in Item 1 of Table 18 is correct, it is the description that was wrong. This cost is for replacement of piping, valves, etc. and non-routine maintenance calls. The table has been revised to reflect this.
124	Table 18	F.1-7	Check numbers, not as bad as the closure costs, but some are off.	The numbers have all been rechecked. There was a rounding error in the formula which has been corrected and the cost estimate adjusted accordingly. The cost back-up information has also been updated and included in Appendix R.