

Commenting Organization	Comment By	Date of Comment	Section/Appendix #	PDF Page Number	PDF Line Number or Figure Number	Comment
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	Executive Summary	IX	129	Please revise the first sentence of the Kiefer Landfill Description, contained within Table ES-2, as follows: "The Kiefer Landfill is a 1,084-acre site with an active class III 200 335-acre solid waste disposal site that is owned and operated by Sacramento County." Source info for revision: Page 2 of https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/sacramento/r5-2016-0013.pdf The number was adjusted upward by 30 acres to account for recently opened landfill Module M4.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	Executive Summary	IX	129	We would prefer that the last sentence of the Kiefer Landfill Description (within Table ES-2), which lists the number of monitoring wells, be removed, as these details are more properly provided in Section 2. If this sentence must be retained within the Executive Summary, then it should be revised as follows: "Currently, the monitoring network at Kiefer consists of 23 65 monitoring wells." If the sentence is retained, the numbers of monitoring wells for the Mather and Aerojet sites (570 and 2000, respectively) should also be listed within this table. Source info for revision to number of wells: Page 10 of https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/sacramento/r5-2016-0013.pdf
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18	2-36	346	Please revise the estimated Remediation Water Use for Kiefer Landfill to 612 AF/year for the 2018 Water Year. Source info for revision: Spreadsheet data previously supplied to Woodard & Curran for CoSANA model on 6/11/2020
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3	2-49	590-592	Please revise these lines to reflect the most recent regulatory orders, as follows: "The CVRWQCB carries out Kiefer Landfill remediation under WDR Order RS-2007 RS-2016-0013 . Additional information can be found here: https://www.waterboards.ca.gov/centralvalley/board_decisions/tentative-orders/0708/keifer/keifer-wdr-adopted_orders/sacramento/r5-2016-0013.pdf "
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3	2-49	593	Please revise this line as follows: "The Kiefer Landfill is a 1,084-acre site with an active class III 200 335-acre solid waste disposal site..." Source info for revision: See Page 2, Finding No. 6 of https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/sacramento/r5-2016-0013.pdf The number was adjusted upward by 30 acres to account for recently opened landfill Module M4.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3	2-49	603	Please revise this sentence as follows: "Sacramento County was issued a tentative order Order No. 89-207 to install a network of monitoring wells." Source info for revision: CVRWQCB Order No. 89-207, copy available upon request. Please also note that Tentative Orders are not issued and not enforceable.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3.1	2-51	618	Please revise the sentence that is fully contained on this line as follows: "Approximately 275,000 650,000 gallons of water are treated each day." Source info for revision: last sentence of 3rd paragraph of Page 2 of: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2015-0012_noas/r5-2015-0012-062.pdf ("The Discharger proposes an average and maximum discharge to the infiltration basin at approximately 450 and 900 gpm, respectively, which are flows expected from the groundwater extraction and treatment system.")
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3.1	2-51	619	Please revise "rate of 1,000 gallons per minute" to "rate of up to 1,000 gallons per minute" Reason: Please see revisions to historical pumping rates which follow below (Line 638 comments), which show that the 1000 gpm level is rarely attained.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3.1	2-51	628	Please revise as follows: "Currently, the monitoring network at Kiefer consists of 23 65 monitoring wells." Source info for revision: Page 10 of https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/sacramento/r5-2016-0013.pdf
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3.1	2-51	630	Please revise as follows: "The infiltration basin pilot study was successfully, and the County is currently awaiting has received approval for permanent use" Source info for revision: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2015-0012_noas/r5-2015-0012-062.pdf
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3.2	2-51	638	Please revise quantities (AFY) in Table 2.1-16, Kiefer Groundwater Pumping, as follows: 2010 1,099; 2011 1,142; 2012 391; 2013 518; 2014 507; 2015 460; 2016 380; 2017 475; 2018 599; 2019 650; Average 622. Source info for revision: Spreadsheet data previously supplied to Woodard & Curran for CoSANA model on 6/11/2020
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.3.3	2-52	642-648	These figures appear to have been extracted from a 2009 report. In 2015 (the last time that these figures were estimated), the numbers for VOCs remaining in Zone A were 90 pounds and for Zone B were 13 pounds. The 2015 annual report is available on Geotracker (see Section 10.7 for total VOC mass estimates). Also, in line 648, "2000" should be replaced with "1995", as 1995 is the reference year for the groundwater cleanup that is used in all reports and orders.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.4	2-52	665-667	There are about ten other landfills listed on Geotracker (https://geotracker.waterboards.ca.gov) that overlay the SASb. Two of these (28th Street and L & D Landfills) are in corrective action.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	2.18.5	2-53	678	Please revise quantity (AFY) in Table 2.1-17 for Kiefer to 622 AFY. Source info for revision: See Line No. 638 comment above.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	3.4.3	3-51	1119	Regarding Table 3-6, L10008601447-MW-13 is a background well for Elk Grove Landfill and currently exceeds the Measurable Objective for Specific Conductivity. As this well is offsite and upgradient of the landfill and does not exceed any Water Quality Protection Standards for the landfill as specified by the CVRWQCB, achievement of the MOs would require action on the part of private landowners (Hilltop Cemetery) and public districts (Cosumnes CSD) and these other parties may wish to dispute or comment on the MOs, which are well below maximum thresholds. Without such input, the MO for Specific Conductivity should be increased to at least 580 umhos/cm, the current level of the Water Quality Protection Standard, and above the current Specific Conductivity of 538 umhos/cm. See Geotracker for further info.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	3.4.3	3-51	1119	Regarding Table 3-6, L10007396297-MW-40B is a downgradient well for Kiefer Landfill and this well currently exceeds the Measurable Objective for Specific Conductivity. However, this well does not exceed any Water Quality Protection Standards for the landfill, the Specific Conductivity is well below maximum thresholds, and no corrective action has been indicated for this location by the CVRWQCB, other than VOC treatment by air stripping (which does not reduce Specific Conductivity). Therefore, the Measurable Objective for Specific Conductivity for this well should be increased to at least the level of the Water Quality Protection Standard, which is set by statistical analysis of background wells and has varied between 480 and 512 umhos/cm in recent years. See latest monitoring reports on Geotracker for further info.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	3.5.2	3-71	Table 3-8	Please change GSA for Well ID L10007396297-MW-40B from OHWD to SCGA. Reference: SCGA MOU dated 5/13/2020 removing Kiefer Landfill from OHWD GSA.

Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	3-D	NA	Table A-1	Please change GSA for all Kiefer Landfill wells from OHWD to SCGA. Reference: SCGA MOU dated 5/13/2020 removing Kiefer Landfill from OHWD GSA.
Sacramento County Department of Waste Management & Recycling	Mike Koza	8/17/2021	3-D	NA	Table A-1	Well depth to upper limit of screened interval for Kiefer Landfill well L10007396297-MW-38B is incorrect. Please use well depth to screen of 170 feet, as reported in Appendix B of 2020 annual monitoring report on Geotracker.