



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

March 5, 2021

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### EXPLANATION OF SIGNIFICANT DIFFERENCES - REVISED, GBF/PITTSBURG LANDFILL, ANTIOCH, CALIFORNIA

Dear Dr. Wilson:

The California Department of Toxic Substances Control (DTSC) received the revised Explanation of Significant Differences (ESD) dated January 2021 and held a 30-day public comment period to solicit the public's input prior to approving the final ESD. The ESD was prepared by TRC, for GBF/Pittsburg Landfill located in Antioch, California. The ESD has been prepared to amend the 1997 Remedial Action Plan to include secondary remedy technologies. The public comment period started January 29, 2021 and ended March 1, 2021. A display advertisement appeared in the local newspaper announcing the public comment period. The major documents (i.e., ESD, fact sheet [FS], etc.) were available for public review at the repository and DTSC website [envirostor \(https://www.envirostor.dtsc.ca.gov/public/\)](https://www.envirostor.dtsc.ca.gov/public/).

DTSC prepared a Responsiveness Summary (RS) to document all public outreach efforts and responses to all comments received during the comment period. The public comments were responded to and do not result in any required changes to the ESD.

As part of the approval process, DTSC conducted Tribal Outreach consultation under Assembly Bill 52 and prepared an Initial Study and Negative Declaration in compliance with California Environmental Quality Act (CEQA) concluding the project would not have a significant effect on the environment or historical artifacts. Through the course of this consultation, the Consulting tribe initially requested four Mitigation Measures to be included in the CEQA document. DTSC determined there was no current evidence supporting mitigation measures in the CEQA document and recommended them as draft project controls in Appendix D of the ESD. Through further consultation, the tribe withdrew their

Amy Wilson, P.E., Ph.D.  
March 5, 2021  
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requested measures and concluded Consultation. DTSC considers the Tribal consultation process complete and requires the application of items 3 and 4 of Appendix D to be followed as precautionary measures so the contractors performing the remedial activities will be informed that they need to be observant and aware to avoid potential impacts to Tribal cultural artifacts.

DTSC hereby approves the ESD. Prior to implementation of fieldwork, please provide a copy of the contractor's site health and safety and air monitoring plan and submit a hard copy and electronic copy of the final ESD, with the RS included as an Appendix, within 15 days from the date of this letter. DTSC will file a Notice of Determination after approving the ESD.

If you have any questions, please contact Garrett Thornton at (916) 255-3748, or via email [Garrett.Thornton@dtsc.ca.gov](mailto:Garrett.Thornton@dtsc.ca.gov).

Sincerely,

Charlie Ridenour  
Branch Chief – Sacramento Office  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

Enclosure

CC: Lori Braunesreither, [Lori.Braunesreither@hsd.cccounty.us](mailto:Lori.Braunesreither@hsd.cccounty.us)  
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### RESPONSE TO COMMENTS FOR THE EXPLANATION OF SIGNIFICANT DIFFERENCES AND INITIAL STUDY/NEGATIVE DECLARATION, GBF/PITTSBURG LANDFILL, ANTIOCH, CALIFORNIA

To Whom It May Concern:

The California Department of Toxic Substances (DTSC) received your comments by phone and electronic mail concerning the Explanation of Significant Differences (ESD) and/or the California Environmental Quality Act (CEQA) Draft Initial Study/Negative Declaration for the Contra Costa Sanitary Landfill (a.k.a. GBF/Pittsburg Landfill). The site is located in Antioch, California. DTSC held a thirty (30) day public comment period that ended on March 1, 2021. DTSC received one comment letter, three comment emails, five public comment forms, and one comment phone call during the comment period. Any duplicate or repetitive comments that were received were answered with a single response. Attached is the responsiveness summary (RS) which addresses all comments received. The RS will be included in the final version of the ESD.

You may contact me at (916) 255-3748, or via email to [Garrett.Thornton@dtsc.ca.gov](mailto:Garrett.Thornton@dtsc.ca.gov) if you have any questions.

Sincerely,

*Garrett Thornton*

Garrett Thornton, P.G.  
Project Manager  
Site Mitigation and Restoration Program

Enclosure

CC: Barry Young, [BYoung@baaqmd.gov](mailto:BYoung@baaqmd.gov)  
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**RESPONSIVENESS SUMMARY  
FOR THE EXPLANATION OF SIGNIFICANT DIFFERENCES  
FOR THE GBF/PITTSBURG LANDFILL  
ANTIOCH, CALIFORINA**

**MARCH 2021**

**The Responsiveness Summary is organized as follows:**

**Section 1 – Introduction**

**Section 2 – Public Review Process**

**Section 3 – Response Summary**

**Attachment A – Copy of the Public Notice / Community Update**

**Section 1 – Introduction**

The purpose of this document is to present a written response by the Department of Toxic Substances Control (DTSC) to comments received during the 30-day comment period held for the Explanation of Significant Differences (ESD) and/or the California Environmental Quality Act (CEQA) Draft Initial Study/Negative Declaration (IS/ND) for the Contra Costa Sanitary Landfill (a.k.a. GBF/Pittsburg Landfill). The 30-day comment period started Friday, January 29, 2021 and ended Monday, March 1, 2021. Concurrent with the release of the draft ESD and IS/ND for public review and comment, a public notice (public notice) was placed in the Pittsburg News and El Observador on January 29, 2021 and a community update (fact sheet) was mailed out to the site mailing list which includes local agencies, residents, and businesses to announce the public comment period. The draft ESD was available for public review on the DTSC website, and at DTSC's Berkeley regional office.

As required under the CEQA, a draft IS/ND was prepared that the proposed actions in the ESD do not result in a significant environmental impact, and do not require mitigation measures.

The draft RAP, fact sheet, public notice, and CEQA documents were also posted on the Internet at: <https://www.envirostor.dtsc.ca.gov/public>

During the public comment period, DTSC received one comment letter, three comment emails, five public comment forms, and one comment phone call. As a result, DTSC has provided information in this responsiveness summary. Any duplicate or repetitive comments that were received were answered with a single response. DTSC has determined that the draft ESD does not require any significant changes as a result of public comments received. The ESD proposes the following activities:

1. The removal of select on-Site groundwater wells and historical soil vapor probes which are part of one-time historical investigations and are not part of a current monitoring program. These locations require removal because they are located

along the alignment of the proposed hydraulic barrier wall (HBW) and/or they will no longer be effective for groundwater monitoring or control after the HBW is installed. As a result, the HBW will require a redesign and reinstallation of the groundwater extraction well network to function effectively.

2. Groundwater Extraction and Treatment (GWET) will remain the primary remedy on the Site; however, with the installation of an HBW, the groundwater extraction well network will need to be redesigned, and a soil vapor extraction (SVE) well network installed, to effectively capture impacted groundwater and soil vapor. The components of the current remedy that will be retained include select groundwater extraction wells, and the groundwater treatment system.
3. The landfill cap and landfill gas (LFG) collection and treatment system will remain in place and operational. To allow room for the HBW installation equipment to operate, the landfill will be modified in select areas along the alignment by “pulling back” the toe of slope where needed and grading throughout to create a level construction corridor. The landfill cover and slopes will be restored to landfill design specifications.
4. The HBW is the primary component of the proposed remedy because this remedial approach is a proven technology that can effectively cut off lateral migration of impacted groundwater and soil vapor.
5. To manage the build-up of groundwater head on the upgradient (south) side of the HBW and prevent groundwater flow and contaminant of concern (COC) transport around (east and west of) the HBW, new groundwater extraction wells will be installed. Groundwater modeling for the Site has indicated that hydraulic capture would be achieved using between 20 and 30 extraction wells.
6. The existing GWETS includes settling via an influent tank, sediment filtration and treatment using granular activated carbon (GAC), with discharge to the Delta Diablo Sanitation District, under permit. The existing GWETS components may be upgraded (e.g., additional filtration units or enhanced settling capacity/time) but the overall treatment approach will not be changed.
7. To manage the build-up of soil vapor pressure on the upgradient (south) side of the HBW and prevent soil vapor flow and COC transport around (east and west of) the HBW, a soil vapor extraction system (SVETS) consisting of SVE wells south of the HBW, conveyance, and treatment will be designed and installed.
8. In-situ groundwater remediation is proposed for two targeted off-Site areas, near monitoring wells MW-55 and MW-69. Future detailed plans for a pilot study and implementation will be submitted to the DTSC.

## Section 2 – Public Review Process

A 30-day public comment period was held from January 29, 2021 to March 1, 2021 to solicit comments from the community on the draft ESD and the CEQA document. Prior to the start of the public comment period, a DTSC fact sheet was mailed to a site-specific radius mailing list and site-specific key contact list. The radius mailing list includes businesses and residents within a mile of the site (approximate) and the key contact list includes key City, County, State and Federal representatives as well as representatives of environmental, social and neighborhood organizations. The fact sheet is included in Attachment A.

On January 29, 2021, a public notice appeared in the Pittsburg News and El Observador to announce the start of the 30-day public comment period, to inform the public about the project and explain how to submit comments. The public notice is provided in Attachment A.

A copy of the approved ESD, CEQA documents, this document, and administrative file for this site are available for review at:

California Environmental Protection Agency  
Department of Toxic Substances Control  
**Attn: File Room**  
8800 Cal Center Drive  
Sacramento, California 95826  
(916) 255-3758 (appointment necessary)  
Hours: Monday through Friday, 8:00 am to 5:00 pm

<http://www.envirostor.dtsc.ca.gov/public/>

The public comment period ended at 5 pm on March 1, 2021. All comments were received via phone, mail, or electronic mail.

## Section 3 – Response Summary

All of the comments received and DTSC's responses are listed below:

### **Residential Commenter 1 concerning ESD –**

Comment: Are the well abandonment/treatment system shutdown activities still ongoing?

Response: The well abandonment activities are paused for now, although contractors do have a drill rig on Site doing a last-minute exploratory boring to help decide final well depth in one location. The rest of the wells, which are all located in the western portion of the alignment far from the neighborhood, will be abandoned after PG&E comes to decommission the low-voltage electrical lines that fed the GWETS.

Comment: Approximately how many trucks are using Curtis Dr. for access per day?

Response: There will be more traffic activity than usual for a short period to mobilize equipment to and from the site at the beginning and end of the project, because they are mobilizing the trencher and related equipment/materials to the Site, and it is coming on multiple oversize truck loads. After that week, the truck traffic on the street should be reduced to what the neighbors have been used to from this project, because most of the work will be on the Site itself. The contractors will still be bringing materials in through the neighborhood.

Comment: Would it be possible for workers to use the entrance off James Donlon Blvd. to complete this work instead?

Response: Contractors cannot use the James Donlon entrance because of the turn radius to get into the Site, and the distance between this entrance and the main staging area. The consultant looked into this early on, wanting to avoid the neighborhood, but it was not viable. That said, the contractor is going to route some future truck traffic this way going forward.

Comment: During the wetter season, is the dust from trucks much of an issue at this site?

Response: Regarding dust, the contractors are employing air monitoring and dust control with water trucks on Site (unless it is wet out and not needed) in order to comply with Bay Area Air Quality Management District requirements and sweeping the streets a couple of times a day.

### **Residential Commenter 2 concerning ESD –**

Comment: Please have this count as a "Yes" vote for the Groundwater Cleanup Plan at the previous Contra Costa Sanitary Landfill.

Response: Thank you for your comment.

### **Residential Commenter 3 concerning ESD –**

Comment: Regarding the "Indoor Air Evaluation," can you advise if an evaluation was done by our home on Garfield Place, Antioch, California?

Response: Up until this point, no results have confirmed a risk to indoor air. In order to verify indoor air conditions, indoor air samples are planned to be collected from 12 residences in the vicinity of the landfill as part of an investigation separate from the work covered in the ESD. Based on previous soil vapor sampling results, the indoor air evaluation is focused on an area closer to the landfill than your house including homes on: Redwood Drive, Cypress Street, Muir Court, Madrone Street, and Wallace.

Depending on sampling results, additional residences may be sampled to define the extent of any threats.

Comment: What is the area of any completed or planned “Indoor Air Evaluations” (neighborhood streets covered or to be covered)?

Response: See previous response.

Comment: Has our neighborhood groundwater been tested (we receive drinking water from the City of Antioch)?

Response: The groundwater in neighborhoods north of the landfill is sampled regularly, the results of that sampling are available for public review online at the envirostor website: <http://www.envirostor.dtsc.ca.gov/public/> Groundwater beneath and in the vicinity of the Site is not a source of drinking water and is not used for any other purpose. The drinking water for the community near the landfill is provided by the City of Antioch. You can view the water quality reports issued by the city on their website: <https://www.antiochca.gov/fc/finance/water/AWQR.pdf>.

Comment: Has the groundwater of the Contra Costa Sanitary Landfill (James Donlon/ Somersville) entered, or have the potential of entering, the Contra Costa Canal which is just north of the landfill?

Response: The groundwater from the landfill does not enter the canal. The canal is at a higher elevation than the groundwater from the landfill.

#### **Residential Commenter 4 concerning ESD –**

Comment: Can property owners receive copies of contamination reports or any studies?

Response: The results and reports for this Site are available for the public to review both online at: <http://www.envirostor.dtsc.ca.gov/public/>, and also in the DTSC repository at DTSC Berkeley Regional Office, 700 Heinz Avenue, Berkeley, California 94710, (510) 540-3800 (call for appointment).

Comment: My property backs up to contaminated site-how do I get contamination tests on my property?

Response: You could submit samples of soil or water from your residence to a local lab for testing or hire a contractor to collect soil vapor samples from your property. However, the contaminated media from the landfill associated with potential off site migration are groundwater and soil vapor. The groundwater is being monitored via groundwater monitoring wells and is mitigated by the city of Antioch supplying water to the residences. The city of Antioch provides testing results of the drinking water they supply on their website: <https://www.antiochca.gov/fc/finance/water/AWQR.pdf>. The soil vapor conditions off-site are also monitored via a network of permanent and temporary



soil vapor wells. Contaminated soil is contained under an engineered cap on the landfill to prevent impacts off-site.

Comment: Does this affect my resale value? Do I have to disclose this if I sell my house?

Response: The contamination associated with the landfill is the responsibility of landfill property owner, not of individual homeowners. All information on this project is currently available to the public on the envirostor website:

<https://www.envirostor.dtsc.ca.gov/public>.

Comment: What if DTSC or any other environmental agency deems this Site and surrounding areas unsafe for humans to live near? Will the city or county be transparent and rectify by relocating and homeowners?

Response: Remedial actions have been ongoing for years to protect human health and the environment from any contaminants associated with the landfill. These additional measures in the ESD are intended to supplement the current remedial actions and provide additional protection. If unexpected conditions are found to exist that put the health of residents near the landfill at risk mitigation measures will be taken to address that risk. If mitigation measures are determined to be necessary, DTSC will work with the local agencies such as the city and county to inform the residences and obtain the necessary permits to complete the remedial work.

#### **Residential Commenter 5 concerning ESD –**

Comment: We see technicians come periodically to test the groundwater under our street. The fact that there is still volatile organic compounds (VOCs) in the groundwater after so many years is very concerning.

Response: Remediation of groundwater plumes often takes decades. The VOCs in groundwater at this site have been actively remediated since the groundwater extraction system was installed in 2002/2003. These additional remedial actions are intended to further protect human health and the environment.

#### **Residential Commenter 6 concerning ESD –**

Comment: Has work started for the remediation of soil?

Response: The soil remediation was completed in the mid 1990s and consisted of a cap comprised of a two foot thick foundation layer of soil, a one foot thick barrier layer of low permeability soil, and a one foot thick vegetative layer to support native vegetation. The landfill capping also included grading to ensure proper drainage, and monuments to monitor settlement rates post closure. The landfill is surrounded by a perimeter fence to prevent access to the Site. This soil remedy remains protective of human health and the environment. There is no additional soil remediation planned.

Comment: As a resident living behind the landfill do I need to be concerned about anything? I also grow a garden? Is there concern there? I tend to water from city water, other than chlorine what other VOCs have been found?

Response: The drinking water for the community near the landfill is provided by the City of Antioch. Groundwater beneath and in the vicinity of the Site is not a source of drinking water and is not used for any other purpose. You can view the water quality reports issued by the city on their website:  
<https://www.antiochca.gov/fc/finance/water/AWQR.pdf>.

Comment: I do not oppose of a cleanup I think it is great. The only thing I have noticed when I am outside is a slight sinus pressure. I have not figured out why.

Response: Thank you for your comment. During construction of the remedy, contractors are employing dust control with water trucks on Site (unless it is wet out and not needed) in order to comply with Bay Area Air Quality Management District requirements and sweeping the streets a couple of times a day.

#### **Residential Commenter 7 concerning ESD –**

Comment: My BA is in geography (CSUH 1969), so I understand what this ESD is proposing and it makes sense. I approve of the sound decision to protect the aquifer from and future contamination.

Response: Thank you for your response.

#### **Comments submitted by Bay Area Air Quality Management District concerning ESD –**

Comment: The draft Initial Study states that the soil vapor extraction system will need to be permitted by the Air District. While that is true, there appears to be a few more sources mentioned that will need Air District permits. For example, the two diesel generators (92 hp and 268 hp, Tier 4) outlined in Appendix A will most likely need Air District permits.

Response: Diesel generators with rated brake horsepower of 50 or greater ( $\geq 50$  bhp) are registered by TRC's onsite contractors in accordance with the California Air Resources Board (ARB) Portable Equipment Registration Program (PERP). Regulation 2 Rule 1 specifically exempts equipment that are registered under the PERP from the requirement to obtain an Authority to Construct (ATC) and Permit to Operate (PTO), so long as the equipment does not remain in a fixed location for more than 12 months (2-1-105). The diesel generators onsite are registered under the PERP and will not be onsite for a duration greater than twelve months and are therefore exempt from the requirements to obtain an ATC and PTO.

Comment: The groundwater treatment system will also likely need an Air District permit as air stripping can cause volatile organic compound emissions. Is the current groundwater treatment system permitted? Please submit the details of this system for our information. Please note that any storage tanks that hold contaminated water will also need to be evaluated for Air District permitting.

Response: The former groundwater treatment system used mechanical and carbon filtration, not air stripping, so a BAAQMD permit was not required. The influent and effluent holding tanks were closed/covered. The system was decommissioned in November 2020. When the new groundwater treatment system is designed and installed, BAAQMD permit applications will be prepared, if required. Currently, air stripping technology or other equipment involving air emissions, including open tanks, are not anticipated to be part of the design.

Comment: In addition, there are four 1100 hp engines for trenchers mentioned in the Appendix A and the draft Initial Study. Do these engines propel the trenchers? If not, they may also need District permits.

Response: The trencher equipment owner and operator (Dewind One-Pass Trenching, "Dewind") registered their equipment in the Diesel Off-Road Online Reporting System (DOORS) under the mistaken understanding that this was all that was required. Upon review of their registration, TRC instructed Dewind to contact the ARB and additionally register the four C32 engines, which do not propel the trencher and are as such portable equipment, under the PERP. Dewind is actively working with the ARB to obtain temporary, expedited PERP registration for the four C32 engines, which are Tier 4. Once registered with the ARB, these engines will be in compliance with District and ARB requirements. The trencher will not operate until the engines are registered.

Comment: Has this project started? The project schedule in Table 3 in Appendix A indicates that the project started in November 2020. If so, the equipment was installed without an Authority to Construct and may be subject to Air District legal and enforcement action. Please encourage the applicant to apply for the required Air District permits as soon as possible.

Response: TRC has verified that equipment onsite are either considered mobile equipment or portable equipment that has been registered under the PERP, with the exception of Dewind's equipment, which is in progress. The in-progress equipment will not operate until temporary PERP registration is received from the ARB. Portable equipment registered under the state PERP is exempt from permitting according to District Regulation 2 Rule 1.

The project as described in the draft IS has not begun. However, a short demonstration section of the barrier wall, which was approved by DTSC separately and did not require public review, was installed between February 2 and 11. The trencher operated seven days during this period. During this time, Dewind became aware of their error in not registering the 4 C32 engines with the PERP and began working actively with ARB to

obtain the expedited PERP registration. As an out-of-state contractor, Dewind had misunderstood the complex California registration requirements. However, we note that the C32 engines are Tier 4 engines, which Dewind had manufactured specifically for this project to be California compliant. As stated above, the trencher will not operate again until temporary PERP registration is confirmed.

**Comments submitted by the Central valley Regional Water Quality Control Board concerning CEQA –**

Comment: Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, please visit our website: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

Response: Section 10 of the IS/ND addresses any impact this project may have on the Pittsburg Plain Groundwater Basin the Site overlays. This section states that the project will have no impact on the groundwater supplies and may not impede sustainable groundwater management of the basin. The remedial action objectives (RAOs) are and will continue to be containment of contamination, reduction of contamination, and attainment of standards which protect the beneficial uses of the waters. Groundwater is not used as a public drinking water supply or for any other purposes. Drinking water for the community near the landfill is provided by the City of Antioch.

Comment: Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)

In part it states: Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

Response: Section 19 of the IS/ND addresses any potential wastewater discharges for this project. The IS/ND states that: The proposed remedy actions would not create the need for or result in the construction of new or expanded water or wastewater treatment, electric power, natural gas, or telecommunications facilities. The construction of the HBW would not affect the current drainage pattern significantly because it would be constructed underground. Runoff from the Proposed Project Site would be managed in accordance with all applicable laws and regulations with updates and amendments to the existing facility NPDES General Permit for Storm water Discharges under the Industrial General Permit, as needed. In addition, the construction of the new HBW would be performed in accordance with the SWPPP.

Comment: Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more

information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

Response: A SWPPP was prepared for the project under the General Permit, which was uploaded into SMARTS on October 29, 2020. The WDID# is 5S07C391982.

Comment: Phase I and II Municipal Separate Storm Sewer System (MS4) Permits

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

Response: The MS4 Permit does not apply to the construction or operational phases of the project.

Comment: Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml)

Response: The industrial Storm Water General Permit does not apply to the construction or operational phases of the project.

Comment: Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Response: The CWA 404 permit does not apply to the construction or operational phases of the project.

Comment: Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

Response: The CWA 401 permit does not apply to the construction or operational phases of the project.

Comment: Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be

eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

Response: The closed landfill is subject to WDR Order R5-2020-0011. On April 15, 2020, in accordance with Requirement E.3 of the WDR, TRC sent a Notification of Landfill cover Disturbance and Slope Modification Activities to Mr. Kenny Croyle in the Title 27 Compliance and Enforcement Unit. This work is compliant with the provisions of the WDR.

Comment: Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: [http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

Response: The dewatering permit does not apply to the construction or operational phases of the project.

Comment: Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for Limited Threat Discharges to Surface Water (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited



Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

Response: The limited threat general NPDES permit does not apply to the construction or operational phases of the project.

Comment: NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

Response: The NPDES permit does not apply to the construction or operational phases of the project.

**ATTACHMENT A**

**PUBLIC NOTICE/COMMUNITY UPDATE  
GBF PITTSBURG LANDFILL  
ANTIOCH, CALIFORNIA**

# DTSC PUBLIC NOTICE

**Department of Toxic Substances Control** – Our mission is to protect the people, communities, and environment of California from harmful chemicals by cleaning up contaminated sites, enforcing hazardous waste laws, and compelling the development of safer products.

## DTSC Proposes Modifications to Groundwater Cleanup Plan at the Contra Costa Sanitary Landfill

**Comment period: January 29, 2021- March 1, 2021**

The Department of Toxic Substances Control (DTSC) invites you to review and comment on the Draft Explanation of Significant Differences (ESD) for a proposed adjustment to the existing groundwater treatment plan at the Contra Costa Sanitary Landfill (a.k.a. GBF/Pittsburg Landfill). The Site is located at the corner of Somersville Road and James Donlon Boulevard in Antioch, California, 94565.

As required by the California Environmental Quality Act (CEQA), DTSC evaluated the potential environmental effects involved with the execution of the proposed cleanup plan changes. The proposed plan is not expected to have significant negative impacts on the environment. However, a final determination will be made only after the public has had a chance to provide input on the proposed changes and the evaluation presented in the ESD. DTSC plans to file a Notice of Determination with the State Clearinghouse once public comments are received and evaluated, and after a decision has been made.

The Draft Explanation of Significant Differences and associated Initial Study/Mitigated Negative Declaration (IS/ND) are available for your review between January 29, 2021 and March 1, 2021. The ESD and IS/ND are available at the public information repositories listed below. Please submit your comments via mail or via email to DTSC's Project Manager, Garrett Thornton, 8800 Cal Center Drive, Sacramento, CA 95826 or via email at [Garrett.Thornton@dtsc.ca.gov](mailto:Garrett.Thornton@dtsc.ca.gov)

**Where Do I Get More Information?** Project related documents can be found at:

DTSC Berkeley Regional Office  
700 Heinz Avenue  
Berkeley, California 94710  
(510) 540-3800 (call for appointment)

You may also access project information on the DTSC EnviroStor website:

<http://www.envirostor.dtsc.ca.gov/public/>

### Contact Information:

For site information: Garrett Thornton, DTSC Project Manager, [gthornton@dtsc.ca.gov](mailto:gthornton@dtsc.ca.gov)

# COMMUNITY UPDATE

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The DTSC evaluated the potential environmental impacts associated with the implementation of the proposed cleanup plan changes and these are not expected to have significant negative impacts on the environment. However, a final determination will be made only after the public has had a chance to provide input on the proposed changes and the evaluation presented in the ESD. The ESD is accompanied by an Initial Study/Negative Determination (IS/ND). DTSC plans to file a Notice of Determination with the State Clearinghouse once public comments are received and evaluated, and after the project is approved.

### ESD PUBLIC COMMENT PERIOD

**January 29, 2021 – March 1, 2021**

The Draft Explanation of Significant Differences is available for your review between January 29, 2021 and March 1, 2021. The ESD is available at the public information repositories listed on page 3. Please submit your comments via mail or via email to DTSC's Project Manager, Garrett Thornton, 8800 Cal Center Drive, Sacramento, CA 95826 or via email at [gthornton@dtsc.ca.gov](mailto:gthornton@dtsc.ca.gov).

### Site History

The Site is currently regulated by both the DTSC and the Regional Water Quality Control Board (RWQCB). From the 1940s to 1992, the landfill accepted municipal, nonhazardous, and hazardous wastes. Beginning in 1987, DTSC oversaw a series of reviews to determine whether these wastes were present in groundwater beneath and downgradient (to the north) of the landfill. Based on the results of these reviews, in 1997 DTSC prepared and approved a cleanup plan, called a Remedial Action Plan (RAP) requiring an engineered cap/cover be installed over the landfill. In addition, an extraction and treatment system was installed to remove and treat solvents found in the groundwater. In 2002, the RWQCB oversaw the installation of the final landfill cover and certified the landfill as closed. The maintenance of the closed landfill and cap is managed by the RWQCB. The extraction and treatment system to remove the solvents was installed in 2003, under the supervision of the DTSC, and has remained in operation since that time. The drinking water for the community near the landfill is provided by the City of Antioch. Groundwater beneath and in the vicinity of the Site is not a source of drinking water and is not used for any other purpose.

## Explanation of Significant Differences (ESD)

A Remedial Action Plan (RAP) for the Site was approved in 1997 to remove and treat volatile organic compounds (VOCs) in the groundwater. As mentioned above, the implementation of the cleanup plan included the installation and operation of a groundwater extraction and treatment system. When DTSC decides to modify an approved RAP, the community is notified of the change through a document called an Explanation of Significant Differences (ESD).

The ESD for this Site describes the proposed change to add a secondary groundwater cleanup approach that would include the installation of an underground barrier wall along the landfill northern and eastern boundaries to reduce the potential for contaminants in the groundwater and in the soil vapor to migrate away from the landfill. The wall construction involves the underground mixing of the soil with bentonite clay and water to form an underground barrier. Additional proposed enhancements to the current groundwater cleanup strategy include upgrades to the existing groundwater extraction and treatment system, and installation of a soil vapor extraction and treatment system.

## Indoor Air Evaluation

DTSC is currently overseeing an indoor air evaluation in the communities to the north and east of the landfill. The purpose of this evaluation is to determine whether vapor from solvents in groundwater could be entering residences and to assess if there are any potential health risks. This environmental evaluation began in December 2020.

Please see the attached Frequently Asked Question sheet for answers to the most commonly asked questions about this project.

The ESD and California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration documents are available for public review at the locations listed in the next page.

**Figure A. Contra Costa Sanitary Landfill location**



## Frequently Asked Questions

### Contra Costa Sanitary Landfill (a.k.a. GBF/Pittsburg Landfill)

January 2021

#### **What chemicals were found in the groundwater beneath the landfill?**

VOCs detected in the groundwater include the solvents trichloroethylene and tetrachloroethene. TCE (trichloroethylene) is a chemical solvent that was commonly used by many industries to remove oil or grease from metal parts. It is also found in some household products such as stain removers and adhesives. PCE (tetrachloroethene or perchloroethylene) is a chemical solvent commonly used for dry cleaning and cleaning metal parts in manufacturing. It is also still used in some consumer products.

#### **What is an underground barrier wall?**

An underground barrier wall is a low-permeability installation meant to reduce the potential for contaminants in the groundwater and in the soil vapor to migrate away from the landfill. At the Site, the wall construction will involve the underground mixing of soil with bentonite clay and water along the northern and eastern landfill boundaries, to keep contaminants contained on the Site. The existing groundwater extraction and treatment system will be upgraded, and a soil vapor extraction and treatment system will be added, to remove and treat contaminants from the landfill.

#### **What is soil vapor?**

Some chemicals in groundwater can form vapors (gas) in the small air spaces between soil particles. "Vapor intrusion" refers to the fact that this vapor can move up through the soil and into overlying buildings through cracks in the foundation or other entry points. Depending on ventilation of the building, these vapors may accumulate within the building. If present, these vapors can cause health effects over time depending on the individual, the length of exposure, and the concentration of the chemical.

#### **If solvents are found in indoor air, am I in danger?**

Not necessarily. Many chemicals are found in indoor air at very low concentrations usually as a result of gas appliances and commonly used household products like cleaning agents, paints, and carpets. At low levels, these chemicals do not pose a health concern. If the chemicals are coming from the landfill at concentrations high enough to pose a potential indoor air risk to you, actions will be taken to prevent vapors from entering your home.

#### **What are the next steps?**

DTSC will review and evaluate public comments on the Draft Initial Study/Mitigated Negative Declaration. DTSC will respond to all public comments received via mail or email during the comment period and make a determination on the proposed changes to the groundwater cleanup plan. Once approved, the construction of the underground barrier wall and upgrades to the extraction systems on-site will begin. We estimate that field activities will begin in early 2021. We will inform the community before the start of activities and we will keep you updated on the progress of the environmental activities at the Site.

#### **Where do I find more information?**

The ESD, IS/ND and other project-related documents are available for review electronically on EnviroStor at:

[https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=07490038](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=07490038)

Project documents are also available for review at the following information repositories. Due to current conditions and because of COVID-19, these repositories may not be open or may temporarily not include the most current documents:

DTSC  
700 Heinz Avenue  
Berkeley, CA 94710  
(510) 540-3800  
(Call for an appointment)

**Who can I contact for more information?**

If you would like more information about this project, please contact the project’s GBF Community Information line at 1 800 640-4451.

You can also reach DTSC staff for questions about the site:

Garrett Thornton Project Manager (916) 255-3748 <a href="mailto:Garrett.Thornton@dtsc.ca.gov">Garrett.Thornton@dtsc.ca.gov</a>	Alejandro Vivas Public Participation (510) 540-3911 (866) 495-5651 (toll free) <a href="mailto:Alejandro.Vivas@dtsc.ca.gov">Alejandro.Vivas@dtsc.ca.gov</a>	Russ Edmondson Media Inquiries (916) 323-3372 <a href="mailto:Russ.Edmondson@dtsc.ca.gov">Russ.Edmondson@dtsc.ca.gov</a>
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Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.



Additional information on DTSC sites can be found through our [EnviroStor](#). (rev. 5-2020)

For community outreach: Alejandro Vivas, DTSC Public Participation Specialist,  
[Alejandro.Vivas@dtsc.ca.gov](mailto:Alejandro.Vivas@dtsc.ca.gov)

For media inquiries: Russ Edmondson, DTSC Public Information Officer,  
[Russ.Edmondson@dtsc.ca.gov](mailto:Russ.Edmondson@dtsc.ca.gov)

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