



December 14, 2001

Kathy Kefauver
Santa Barbara County
Public Works Dept.
Solid Waste and Utilities Division
109 E. Victoria Street
Santa Barbara, CA. 93101

RE: Draft Environmental Impact Report for Tajiguas Landfill Expansion,
Project: 01-EIR-5

Dear Ms. Kefauver:

Heal the Ocean, representing over 2,000 citizens concerned with the ocean pollution problems in Santa Barbara County, has been concerned about the polluted state of the ocean at Arroyo Quemada for some time. In Heal the Bay's "Beach Report Card," the beach at Arroyo Quemada has received an "F" rating for *83% of all weekly testing* in this area – and Heal the Bay has rated this beach THE dirtiest beach in Southern California.

We have reviewed the draft Environmental Impact Report for the proposed expansion of the Tajiguas Landfill, which is on the coast at Arroyo Quemada. Since the landfill is unlined, and situated in a coastal canyon with a river running through it (Pila Creek) to the sea at Arroyo Quemada, the contributions of the Tajiguas Landfill to the ocean pollution problems in this area are of particular concern to us.

This letter is to record our objections to assumptions and inadequate conclusions in the draft EIR for the proposed expansion of the Tajiguas Landfill, a document that, in summary, does not adequately address the pollution of groundwater by landfill material.

We address our comments to the issue of groundwater.

SECTION 3.2 WATER RESOURCES

Page 3.3-23 of the draft EIR states, “Groundwater is also present in the lower portions of the landfill mass.”

ARCADIS G&M “September 2001 Hydrologic Investigations Status Report” (page 15-17) describes groundwater present in monitoring and dewatering wells located throughout the landfill.

ARCADIS report in draft EIR’s technical appendix states that 40,000 gallons of water (leachate) was removed from the landfill during the testing of the dewatering wells.

Page 3.3-50 of the draft EIR indicates groundwater quality impacts “would be considered significant” according to CEQA if waste is allowed “to come within 5 feet of the highest groundwater.”

Table 3.2-3 stratigraphy of Tajiguas landfill project site states that the “unweathered Rincon is mainly massive, but zones of intensely fractured rock have been observed.”

How “intensely fractured rock” can act as a berm or barrier to groundwater migration is not explained in the draft EIR.

Page 3.3-9 of the draft Environmental Impact report states, “The groundwater flows from topographically high areas downward to stream channels, where the flow emerges as discharge to the streams if the water level is high enough or as underflow in alluvial fill or fractured bedrock below the channel.”

The October 2000 Technical Report Review of Surface Water Resources Page 6 indicates that the Pila Creek watershed yields 46 acre feet per year (i.e. almost 15 million gallons) and only 1,517,824 gallons of water is collected by the interceptor trench each year. This means that up to 13 million gallons of water per year is bypassing the collection trench and of this amount it is not known how much of this is groundwater that is mixing with the trash that is being stacked into the Tajiguas landfill.

The ARCADIS REPORT, included in the Technical Studies supplement, focuses on a cross section of the lower portion of the landfill, and includes observations of gas extraction wells having standing water in the casings. The level of standing water indicates a level of saturation that is at least 100 feet above the bottom of the landfill. *This is an indication that the groundwater beneath the landfill is not separated from the trash, but has saturated the trash.*

Heal the Ocean ardently disagrees with the statement that “Tajiguas is currently in compliance with its operating permits” – because there is considerable evidence – in the draft EIR technical report itself – that groundwater, as well as surface water, is mixing with the trash.

In fact, the Tajiguas Landfill is violation of prohibition A. 10, Board Order No. 93-69 (Regional Water Quality Control Board) which stipulates that there be a five-foot separation of trash from groundwater. *Specifically, this language states,*

“Discharge of waste within five feet of the highest anticipated elevation of underlying groundwater, including the capillary fringe, is prohibited.”

On May 5, 1998, the Regional Water Quality Control Board notified Santa Barbara County Public Works by letter that subsurface investigation *must be performed to determine whether the Landfill is or will be within five feet of underlying groundwater and that investigation of the buried alluvial zone of Pila Creek should be performed as well.* This has not been addressed, nor is this subject addressed in the draft EIR.

If anything, the Arcadis G&M report of groundwater in monitoring and dewatering wells located throughout the landfill indicates a saturation of the current landfill by groundwater. As noted in the draft EIR, the interceptor trench receives water daily (at the rate of 5,000-10,000 gallons per day, our addition) – during dry periods, when Pila Creek is not running.

As to the presence of springs (groundwater) underneath the Tajiguas Landfill, the draft EIR noticeably omits a sworn declaration of former landfill manager Bob Cady to the California Integrated Waste Management Board regarding water infiltration of the Tajiguas Landfill. This document was supplied to Santa Barbara County Public Works some years ago.

In this declaration, Mr. Cady describes his personal observations of “water consistently flowing in large quantities from natural springs along the east side of the landfill canyon, where the artificial channel was cut.”

“I also observed water from above the canyon draining into the artificial channel, adding to the volume of water which flowed through it. The flow of water continued through the channel even as waste was dumped on the location and covered the channel.

“It is my observation that water continues to percolate from the sides of the canyon and from above the canyon into the mass of waste below.

“I personally observed water from underneath the landfill, coming from the former artificial channel and its overflow, into the waste at the base of the landfill, behind the landfill’s earthen toe. The presence of this water continued throughout the time of my supervision of the landfill. It required regular pumping to remove.”

The attached evaluation of the draft EIR for the proposed expansion of the Tajiguas Landfill, prepared by Geosolv, LLC, describes in more detail the groundwater pollution issues associated with the unlined landfill stacked on top of natural springs.

Page 3.3-40 of the draft EIR states, “Potential sources for the bacterial contamination include: native fauna, runoff from green waste, runoff from the active landfill surface, and avian feces.” The draft EIR fails to include a proper consideration of leachate runoff, runoff from groundwater that percolates through the garbage and collected only partially in the interceptor trench.

Heal the Ocean submits a report prepared by GeoSolv, LLC, which describes in more detail the groundwater pollution issues associated with an

unlined landfill stacked on top of natural springs. We request that this report be included in the published comments to the draft EIR.

We also submit for inclusion to the record two graphs of bacterial readings associated with the Tajiguas Landfill. One is composed of Santa Barbara County's own figures, averaged for the year 2000, which indicate total coliform counts seven times the state standard/limits; fecal coliform eight times higher than the state standard/limits, and enterococcus 400 times higher than state standard/limits.

On January 16, 2001, Heal the Ocean took a professional sampler to the Tajiguas Landfill, to test for total and fecal coliform, and enterococcus, from three locations, including the trench water (groundwater) that is pumped into the overhead tanks near the Landfill offices. This water cannot come into contact with seabirds or

septic systems – two sources of bacteria implied in the draft EIR as possible contributors to the ocean pollution problem at Arroyo Quemada.

The fecal coliform reading was 240,192 MPN/100ml (most probable number per 100 milliliter of sample water) – while state standards for fecal coliform are 400 MPN/100 ml. These readings indicate to us that groundwater in the landfill area, not accessible to seabirds or septic systems, is severely contaminated.

The draft EIR contains no such monitoring data of groundwater.

The draft EIR fails to specifically address the question of the bottom of the landfill in relation to groundwater – as to whether the bottom of the existing landfill is in contact with the trash.

Heal the Ocean maintains that the Tajiguas Landfill may well be in violation of Title 15, Article 3, 2530(c), which states: “All new...existing landfills, waste piles, and surface impoundments shall be operated to ensure wastes will be a minimum of 5 feet above the highest anticipated elevation of underlying ground water and dischargers shall not be entitled to exemption under subsection 2510 (b) of this subchapter.”

Before the Tajiguas Landfill can be expanded – or continued in its present state – there must be a mapping of the bottom of the current landfill, together with an evaluation of existing groundwater depth. The draft EIR must address the concerns of the Regional Water Quality Control Board in their communications to Santa Barbara County Public Works, as follows:

- Notice of May 5, 1998 requiring an investigation to determine whether the Landfill is or will be within five feet of underlying groundwater; documentation of how waste was placed over the original alignment of Pila Creek; an investigation of the buried alluvial zone of Pila Creek.
- Notice of Violation, June 19, 1998, with time schedule for compliance, requiring an analysis of contact between landfill material and surface and subsurface inflow – together with a solution for alleviating the problem.

The laws regulating existing landfills are clear in regard to groundwater. Until the current landfill is brought into compliance in relation to these laws, any

expansion of the Tajiguas Landfill, and any draft EIR for the expansion of the Tajiguas Landfill, has no practical significance, and may be in fact a nefarious waste of Santa Barbara County taxpayer money.

Heal the Ocean requests that the attached report from GeoSolv, LLC, "Evaluation and Reporting on Contaminant Hydrogeological Conditions at the Tajiguas Landfill," be included in the comments to the draft EIR. We request the inclusion of the Cady Declaration, and the bacteria study graphics, also.

Sincerely,

A handwritten signature in black ink that reads "Hillary Hauser". The signature is written in a cursive, slightly slanted style.

Hillary Hauser, executive director
HEAL THE OCEAN

Enc: 1) GeoSolv, LLC report, "Evaluation and Reporting on Contaminant Hydrogeological Conditions at the Tajiguas Landfill"
2) Declaration of former Landfill Manager Bob Cady before the California Integrated Waste Management Board
3) Bacteria test results, Santa Barbara County averages for year 2000; Heal the Ocean test January 16, 2001

CC: Regional Water Quality Control Board
California Integrated Waste Management Board