

Meeting Date: 5/7/2013

Report Type: Consent

Report ID: 2013-00350



Title: Approval of Amendment to 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill Solar Installation

Location: 20 28th Street, Sacramento, District 3

Issue: Conergy, Inc. seeks to install a solar facility at the closed 28th Street Landfill. The California Department of Resources Recycling and Recovery (CalRecycle) requires the landfill postclosure plan to be updated when there is a change in use for the site.

Recommendation: Pass a Resolution approving the Amendment to the 1993 Final Closure and Postclosure Maintenance Plan to include Solar Installation at the 28th Street Landfill.

Contact: Steve Harriman, Integrated Waste General Manager (916) 808-4949

Presenter: Steve Harriman, Integrated Waste General Manager (916) 808-4949

Department: General Services

Division: Solid Waste Admin Services

Dept ID: 13001711

Attachments:

- 1-Description/Analysis
- 2-Exhibit A-Plan Description
- 3-Resolution
- 4-Exhibit B, Part 1 - CalRecycle Approval Letter
- 5-Exhibit B, Part 2 - Sacramento County Approval Letter
- 6-Exhibit B, Part 3 - State Water Resources Control Board Approval Letter
- 7-Exhibit B, Part 4 - State Water Resources Control Board Comments Letter

City Attorney Review

Approved as to Form
Gerald Hicks
5/1/2013 9:18:39 AM

City Treasurer Review

Reviewed for Impact on Cash and Debt
John Colville
4/19/2013 12:58:57 PM

Approvals/Acknowledgements

Department Director or Designee: Reina Schwartz - 4/25/2013 2:34:58 PM



Description/Analysis

Issue Detail: The proposed solar farm project at the 28th Street Landfill (Sutter's Landing Park) includes the installation of a 1.5 megawatt (MW) photovoltaic solar facility for a 20-year lease term, which will be developed and operated by Conergy, Inc. (Sacramento City Council Report 2013-00349).

The change in land use resulting from the solar installation at Sutter's Landing Park requires that the 28th Street Landfill Closure and Postclosure Maintenance Plan be amended to include the solar installation. The amended maintenance plan must be reviewed and approved by the Sacramento County Environmental Management Department, Local Enforcement Agency (LEA), CalRecycle, and the Central Region of the California Regional Water Quality Control Board (RWQCB). The amended plan is available on the City's Solar Park web page at <http://www.cityofsacramento.org/generalservices/solid-waste-recycling/SuttersLandingParkSolarProject.cfm>.

The project includes installation of solar panels on 3.7 acres of unused asphalt area of approximately 8.5 acres in size immediately west of the dog park. The project underwent a design change to minimize any significant environmental impacts to wildlife habitat. In addition, there will be single solar panels installed in the dog park to provide added shade for users, and a "carport" structure covered with panels that entirely covers the asphalt parking lot east of 28th Street.

Following is a summary of the key points of the approval process:

1. The Amendment to the 1993 Final Closure and Postclosure Maintenance Plan was submitted to the LEA, CalRecycle, and RWQCB on March 21, 2013 for review and approval.
2. The City is required to respond to comments from these agency reviews, and establish a funding mechanism for additional postclosure maintenance costs.
3. Agencies then approve the Amendment to 1993 Closure and Postclosure Maintenance Plan. The LEA, CalRecycle, and RWQCB submitted approval letters, which are attached to the resolution as Exhibit B.

Policy Considerations: The approval of the Amendment to 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill will meet the requirements of Title 27 for the postclosure maintenance period for the closed 28th Street Landfill.

Economic Impacts: None

Environmental Considerations: The design of the project has been modified to address concerns that the solar panels may adversely affect the Swainson's Hawk as it forages for food at the 28th Street Landfill, as well as ensure that it will not adversely affect drivers with a bright glare when passing by the project on the Business 80 freeway.

Sustainability: Approval of the amendment will allow the generation of renewable energy from this project thereby reducing greenhouse gases for the energy produced.

Commission/Committee Action: None

Rationale for Recommendation: The Amendment to the 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill is needed to meet CCR Title 27 requirements for the solar installation, which is a change in postclosure land use.

Financial Considerations: Postclosure maintenance of the project will be the responsibility of the City and Conergy, Inc. through its lease with the City. The City's estimated annual postclosure maintenance costs for the solar installation are \$6,980.

Emerging Small Business Development (ESBD): No goods or services are being purchased as a result of this report.



EXHIBIT A: PLAN DESCRIPTION

Amendment to 1993 Final Closure and Postclosure Maintenance Plan

The Amendment to 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill is required for the closed 28th Street Landfill under California Code of Regulations (CCR) Title 27. The plan describes the postclosure maintenance activities that are performed at 28th Street Landfill over its postclosure period of 30 years. It includes final cover maintenance, repairs, environmental monitoring of groundwater and landfill gas, as well as security and emergency measures to be taken in the event of damage to the landfill final cover system.

Changes to the postclosure land use at 28th Street Landfill must be described in an Amendment to the 1993 Final Closure and Postclosure Maintenance Plan. The Plan must be reviewed and approved by the LEA, CalRecycle, and Central Valley Regional Water Quality Control Board (RWQCB). The subject solar project has been evaluated and described in the Amendment to 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill.

Proposed Project

The proposed project includes construction and operation of a 1.5 megawatt (MW) photovoltaic solar facility. The proposed project includes both ground-mounted solar modules and modules mounted on columns. Solar modules would consist of a collection of solar photovoltaic panels, each of which measures 5'4" x 3'3" x 1.8". Modules would be mounted on shade structures on columns with a 20-degree tilt. The tilt would direct the module's surface generally to the south to obtain the highest exposure to the sun.

Construction and Operation

The proposed project will be constructed and operated in accordance with the City of Sacramento's Post Closure Land Use Plan (PCLUP), January 8, 2013. The PCLUP has been prepared in accordance with CCR Title 27, Section 21190 et seq. The City of Sacramento is the owner of the site and is the Responsible Party (RP) for implementation of this PCLUP and the most recent 28th Street Landfill Post Closure Maintenance Plan and Amendments. The PCLUP will be implemented in compliance with RWQCB regulations.

Each of the three array areas has its unique design and construction constraints due to the landfill cover materials on which it is located. Arrays 1 and 2 would require minor excavation and site preparation for the foundations. Array 3 would be located on existing asphalt paving, and would not require excavation. No grading of the site would occur in connection with the installations, and minor excavation and site preparation would be required only for concrete foundations for the solar panels proposed on columns.

Array 1 would be located in the parking area and would include 1,540 modules on columns in a portion of the compost/parking area of West Site as shown on Figure 3. The cover system in this area consists of 2 to 4 inches of asphalt over 6 to 18 inches of aggregate base. Under the aggregate base are 3 to 18 feet of soil cover and 12 to 32.5 feet of landfill debris. Beneath the landfill debris are native sand and gravel layers typically encountered from 32 to 43.5 feet below ground surface. The concrete support footings for these arrays will extend approximately three feet below the surface of the asphalt and will be placed on compacted soil cover. Asphalt would be sealed against the concrete base of the footings in this area.

Array 2 would include 140 modules and would be mounted on columns within the Dog Park. The dog park area is not paved and has a soil cover. The underlying strata are 3 to 18 feet of soil cover and 12 to 32.5 feet of landfill debris. The debris underlying this area consists of layers of street cleaning debris. Beneath the landfill debris are native sand and gravel layers typically encountered from 32 to 43.5 feet below ground surface. The concrete support footings for these arrays would extend approximately three feet below the surface of the ground and would be placed on compacted soil cover. A soil bentonite mixture would be compacted to seal against the concrete base of the footings in this area.

Array 3 would be located on the paved area west of the Dog Park and would include 4,508 ground-mounted or earth screw-mounted modules. There are no current park activities located in this area. Modules in Array 3 would be mounted on aluminum racks that support 28 panels mounted in a portrait configuration, and stepped back 100 feet from an elderberry bush to avoid impacts to the federally protected Valley Elderberry Longhorn Beetle. The area is covered with asphalt paving, used as the landfill cap. The underlying strata are 3 to 18 feet of soil cover and 12 to 32.5 feet of landfill debris. The debris underlying this area consists of layers of street cleanings, municipal sludge, and garbage fill. Array 3 would be completely enclosed with a fence consistent with the Dog Park perimeter fence, 6 feet in height.

The construction period is anticipated to be four months, beginning in May and completed by the end of August. Development of the project site would require delivery of the solar modules and racks, construction of shade structures, installation of the solar modules, and completion of electrical connections. Work would begin with foundation and trenching layout at all three array areas. Placement of rebar, columns, concrete, conduits, and backfill would follow. Once poured concrete has cured, the structural beams and supporting structure for the solar modules would be installed followed by installation of the modules and all electrical wiring.

Solar modules and racks would be delivered in semitrailer trucks, and maneuvered on site with gas-powered vehicles. Semi-trucks and trailers would make regular deliveries to the project site. Concrete ballasts and racks would be transferred from trailers to the staging area, delivered to the installation site, and assembled on the site. Modules would be delivered in the same manner, and installed. Access to the

site for installation, maintenance and removal would be via existing roadways at the site. No new roads would be constructed.

Minor maintenance around the base would be required for the column-mounted solar modules. No landscaping would be required for the ground-mounted modules on the paved area. Ground-mounted solar panels would be installed in rows on concrete ballasts pads or on embedded earth screws with adequate space to allow passage of a pickup or small maintenance vehicle. Operation of the solar facility requires periodic inspection by Conergy for purposes of security and repairs, if needed. The solar facility would not require any outside sources of energy, or generators on the site as part of its operation. The modules would be cleaned periodically with water. Racks holding the solar modules would be regularly inspected.

Site Security

The park currently has an on-site security guard who patrols the park 24 hours a day, seven days a week. The gates would continue to be locked at 5:00 p.m. Ground-mounted solar facilities on the paved area west of the dog park (Array 3) would be enclosed with a fence to prevent entry by unauthorized persons. Modules mounted elsewhere on the site would be mounted on top of shade structures or similarly enclosed with a fence for security purposes. The solar arrays would be bolted to the support structures and would not be easily removed. The electrical wiring would be below grade to the maximum extent possible without disturbing the landfill cap. The control/power cabinets would be locked. Security of the solar array installations would be the responsibility of City of Sacramento; and the site would be inspected on a regular basis. Any repairs to the fencing or other structures in support of the solar facility will be made within a reasonable amount of time, as specified in the lease agreement.

Entitlements and Permits

City Action

- Approval of the Amendment to 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill.

Resource Agencies

- CalRecycle, with authority as delegated to the County of Sacramento Environmental Management Department (Local Enforcement Agency): Approval of the amendments to the Post-Closure Maintenance Plan
- Regional Water Quality Control Board
- Sacramento Metropolitan Air Quality Management District

Amendment to 1993 Final Closure and Post Closure Maintenance Plan (FCPMP)

Post closure maintenance requirements, as well as the financial assurance requirements for the site, are contained in the 1993 Amendment to Final Closure and Post Closure Maintenance Plans and subsequent Amendments. The Landfill Facility No. is 34-AA-0018. The Waste Discharge Number is WDR No. R5-2004-0039. CalRecycle and the Regional Water Quality Control Board are Responsible Agencies under CEQA, and will use the City's environmental document for permitting purposes.

The Amendment to 1993 Final Closure Land Use Plan for 28th Street Landfill addresses elements of the plan affected by the project. Such elements would include, for example, identification and description of the landfill units affected; proposed modifications to the cover design; construction reporting; financial assurances; cover settlement surveys/monitoring, plans for cover maintenance and repairs; facility operations; drainage controls; protection of landfill gas and groundwater monitoring systems; facility access; and change in land use.



RESOLUTION NO.

Adopted by the Sacramento City Council

APPROVING AMENDMENT TO 1993 FINAL CLOSURE AND POSTCLOSURE MAINTENANCE PLAN FOR 28th STREET LANDFILL FOR SOLAR FACILITY AT SUTTER'S LANDING PARK

BACKGROUND

- A. Amendment to 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill for the 1.5 megawatt solar facility at Sutter's Landing Park is required under California Code of Regulations (CCR) Title 27.
- B. The Amendment to 1993 Final Closure and Postclosure Maintenance Plan was submitted to the Sacramento County Environmental Management Department, Local Enforcement Agency (LEA), CalRecycle and the Central Region of the California Regional Water Quality Control Board (RWQCB) on March 21, 2013. Approvals from all three agencies are attached as Exhibit B.
- C. The additional annual postclosure maintenance costs to the City will be \$6,980.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE CITY COUNCIL RESOLVES AS FOLLOWS:

Section 1. The Amendment to 1993 Final Closure and Postclosure Maintenance Plan for 28th Street Landfill is hereby approved.

Exhibits:

- Exhibit A: Plan Description
- Exhibit B: Agency Approval Letters

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

EXHIBIT B: Approval and Comment Letters, Part 1

April 23, 2013

Ms. Dana L. Allen
Environmental Planning Services
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, California 95811

**28TH STREET LANDFILL, SACRAMENTO COUNTY, SWIS# 34-AA-0018
REVISED FINAL CLOSURE AND POST CLOSURE MAINTENANCE PLANS
POST CLOSURE LAND USE PLAN – SOLAR IMPROVEMENTS
APPROVAL**

Dear Ms. Allen:

Staff of the Engineering Support Branch of the California Department of Resources Recycling and Recovery (CalRecycle) has reviewed the revised final closure and postclosure maintenance plans (Revised Plans) as well as the postclosure land use plan (PCLU Plan) for the Solar Improvements on the 28th Street Landfill.

Documents reviewed include the following:

- *Revised Final Closure and Post Closure Maintenance Plan, Volumes 1 -4*; dated October 1993 (Revised April 12, 2013); prepared by SCS Engineers.
- *Final Post Closure Land Use Plan – Solar Improvements*; dated September 2012 (Revised April 12, 2013); prepared by SCS Engineers.

The 28th Street Landfill (landfill) is located within and is owned by the City of Sacramento (City). The Landfill was certified closed in 1998 and since that time has been in postclosure maintenance. The environmental controls within the Landfill include:

- Leachate collection and removal system
- Landfill gas collection system
- Landfill gas monitoring wells/probes
- Groundwater monitoring system
- Surface water monitoring system



The PCLU Plan is contained in the Revised Plans as Appendix O and provides design information regarding the proposed solar generating panels on parts of the landfill. The solar improvement panels will be located on the west side of the landfill in three different arrays. Array 1 panels will be installed within the area known as the Parking Area, with Array 2 in the Dog Park, and Array 3 within the compost/parking area of the West Site. All panels will be supported by columns and skids and, once installed, will be in direct contact with the final cover barriers in Arrays 1, 2, and 3.

CalRecycle staff has reviewed the Revised Plans and PCLU Plan and have determined that the amendments to the Plans meet the requirements of Title 27, California Code of Regulations. The Sacramento County Environmental Management Division, acting as the Solid Waste Local Enforcement Agency, and the Central Valley Regional Water Quality Control Board approved the amendments to the Plans on April 19, 2013, and April 18, 2013, respectively. Therefore, the Revised Plans and PCLU Plan are hereby approved.

It is the operator's obligation to submit plans that are in compliance with the aforementioned requirements. CalRecycle staff's determination that the Plans meet these requirements is not intended nor should be construed to preclude CalRecycle from seeking revisions to the Plans to the extent it is subsequently determined that any part thereof is not in compliance.

Should you have any questions or comments concerning the above matter, please contact Gino Yekta of my staff or me at (916) 341-6354 or (916) 341-6289, respectively. Alternatively, staff may be contacted at gino.yekta@calrecycle.ca.gov or michael.wochnick@calrecycle.ca.gov.

Sincerely;



Michael B. Wochnick, PE, Manager
Closure and Technical Support Section

cc: John Moody, Central Valley Regional Water Quality Control Board, Sacramento
John Lewis, Sacramento County Solid Waste Local Enforcement Agency
Ambrose A. McCreedy, SCS Engineers



Countywide Services Agency

Environmental Management Department

Environmental Compliance Division
Elise Rothschild, Chief

Bradley J. Hudson, County Executive
Ann Edwards, Chief Deputy County Executive
Val F. Siebal, Department Director

County of Sacramento

EXHIBIT B: Approval and Comment Letters, Part 2

April 19, 2013

Dana Allen, Associate Planner
City of Sacramento
Community Development Department
300 Richards Blvd.
Sacramento, CA 95811

Dear Ms. Allen:

SUBJECT: LEA REVIEW OF AMENDMENT TO OCTOBER 1993 FINAL CLOSURE AND POST CLOSURE MAINTENANCE PLAN FOR SACRAMENTO CITY (28TH STREET) LANDFILL PHOTOVOLTAIC PROJECT – SWIS# 34-AA-0018

Background

The Environmental Management Department is the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling and Recovery (CalRecycle). SCS Engineers, a consultant for the city of Sacramento, submitted an amendment to the October 1993 Final Closure and Post Closure Plan (FC/PCMP) for the City of Sacramento 28th Street Sanitary Landfill to the LEA on March 22, 2013, on behalf of The City of Sacramento, the owner and responsible party (RP) for the site, followed by further revisions on April 12, 2013, based on draft LEA feedback. The plan is specific to the solar photovoltaic project proposed for the site.

The LEA has reviewed the Plan concurrently with CalRecycle and provides the following determination, which follows earlier LEA comments on the Mitigated Negative Declaration, the Notice of Preparation, the Draft Initial Study, and the Final Post Closure Land Use Plan (FPCLUP) for the project.

LEA Determination

The plan, which includes the FPCLUP as an addendum is only intended to address changes associated with the solar project. The overall plan is required by 27 CCR, section 21865 to be updated by July 1, 2013. The LEA has therefore limited its review and comments to items that bear directly upon the solar project with the intention of performing a more comprehensive review of the FC/PCMP when the overall plan is updated.

The LEA has determined that the plan is adequate in meeting the requirements of Title 27, California Code of Regulations.

This determination in no way precludes the LEA from requiring revisions of the plan if it is later determined that any aspect of the plan is not in compliance.

Contact

If you have any questions regarding this letter, please contact John Lewis at (916) 876-7279.

Sincerely,



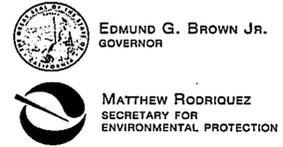
John Lewis
Environmental Specialist III
Solid Waste Program

JL:LT:jm

c: Gino Yekta, CalRecycle
John Moody, Regional Water Quality Control Board
Steve Harriman, City of Sacramento Department of Utilities

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EXHIBIT B: Approval and Comment Letters, Part 3



Central Valley Regional Water Quality Control Board

23 April 2013

Ms. Dana L. Allen
Environmental Planning Services
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, California 95811

AMENDED FINAL CLOSURE AND POSTCLOSURE MAINTENANCE PLAN, 28TH STREET LANDFILL, CITY OF SACRAMENTO, WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2004-0039, SACRAMENTO COUNTY

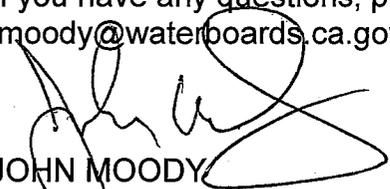
Central Valley Water Board permitting staff has reviewed the April 2013 amended Final Closure and Postclosure Maintenance Plan (FCP/PCMP) submitted by SCS Engineers for the 28th Street Landfill. The FCP/PCMP amendments reflect plans for construction of a proposed solar collection facility at the site as described in a revised Postclosure Landuse Plan (PLUP) submitted for the project. The amended FCP/PCMP includes 30 percent design plans; a geotechnical report; updated/revised postclosure cost estimates; a revised PLUP; a project schedule; and other information. Our comments on the amended FCP/PCMP are as follows:

1. Given that the project will be limited to the unclassified fill areas at the site; will not affect a low permeability cover under Section 21190 of Title 27, and otherwise appears to adequately address water quality concerns, Water Board staff does not anticipate the need to revise Waste Discharge Requirements Order No. R5-2004-0039 for the project to go forward.
2. It is our understanding that the project is to be constructed during the summer of 2013. As noted in our comments on the original (December 2012) PLUP (copy enclosed), the project needs to comply with storm water regulations, as applicable.
3. A more comprehensive update of the FCP/PCMP and other project documents will likely be required as part of the next WDR update, currently anticipated to occur in 2014. Water Board permitting staff will notify the City at the appropriate time of the need to submit such updated documents before the WDR update process begins.
4. We concur with the proposed amendments to the FCP/PCMP for construction of the proposed solar project.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCÉE, EXECUTIVE OFFICER

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If you have any questions, please feel free to contact me at (916) 464-4641 or by email at jmoody@waterboards.ca.gov.



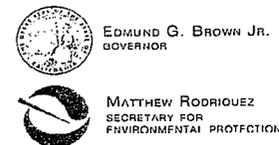
JOHN MOODY
Water Resources Control Engineer
Title 27 Permitting and Mines

Enclosure

cc: Gino Yetka, CalRecycle, Sacramento
John Lewis, Sacramento County Environmental Management Department,
Sacramento
Steve Harriman, City of Sacramento Department of Utilities, Sacramento
Ambrose McCready, SCS Engineers, Sacramento



FILE COPY



Central Valley Regional Water Quality Control Board

10 December 2012

Ms. Dana L. Allen
Environmental Planning Services
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, California 95811

PROPOSED SOLAR COLLECTION FACILITY FOR 28TH STREET LANDFILL, CITY OF SACRAMENTO; WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2004-0039, SACRAMENTO COUNTY

Central Valley Water Board Permitting Unit staff has reviewed the September 2012 Post Closure Land Use Plan (report or proposal) for the 28th Street Landfill prepared by SCS Engineers. The report proposes installation of solar panel arrays on both sides of 28th Street west of the classified waste management units (WMUs A and B) at the site. The arrays would be sited on portions of the unclassified fill areas (CAI units) described in WDR Order No. R5-2004-0039.

Three solar panel arrays ranging up to 3.5 acres in area would be installed at the site, including one in the asphalt-covered parking area between 28th Street and WMU B; one in the dog park area on the west side of 28th Street; and one in the soil stockpile area immediately southwest of the dog park area. The project would involve some disturbance of the landfill cover in these areas for placement of support structures such as columns and footings. Trench work would also be involved for placement of utility lines. Up to 31 inches of settlement is expected in asphalt-covered areas and 23 inches in soil covered areas over the long term. The arrays' storm water runoff would be tied in to existing storm water facilities with sufficient capacity to handle a critical storm event under the WDRs. According to the City, the project will not be feasible unless it can be constructed during the summer 2013, as proposed. Water Board staff's comments are as follows:

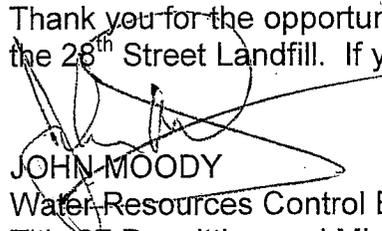
1. Staff concurs with LEA and CalRecycle comments regarding the need for amendment of the Final Closure and Post Closure Maintenance Plan (FCPMP) for the landfill to address elements of the plan affected by the project. Such elements would include, for example, identification and description of the landfill units affected; proposed modifications to the cover design; construction reporting; financial assurances; cover settlement surveys/monitoring, plans for cover maintenance and repairs; facility operations; drainage controls; protection of landfill gas and groundwater monitoring systems; facility access; and change in land use.

KARL E. LONGLEY SCD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

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2. The proposal needs to specifically address whether the project can be constructed and operated in compliance with WDR Order No. R5-2004-0039, including the April 2000 Standard Provisions, with specific emphasis on Facility Specifications. In making this demonstration, the proposal needs to identify those findings and requirements most relevant to the project (e.g., construction, monitoring, corrective action) and explain why the project would not violate the WDRs. References to Title 27 regulations, where relevant, should be included in this demonstration.
3. If the above evaluation indicates that the project cannot be constructed and/or operated in compliance with the current WDRs, the Discharger will need to apply for revised or amended WDRs. In such case, the Discharger would need to revise and re-submit the proposal, along with the revised/amended FCPMP as part of a Report of Waste Discharge (RWD) under Title 27, Section 21769. Completed Joint Technical Document (JTD) Index and WDR application forms would also need to be included with this submittal.
4. The project would need to obtain coverage under the General Storm Water Permit for Construction Activities, or otherwise demonstrate compliance with storm water regulations. Questions regarding this permit should be directed to Jacque Kelley of our office at (916) 464-4764.
5. The project proposal should clarify which areas are to be developed within Sutter's Landing Park and indicate which departments within the City (i.e., Parks or Utilities) will have responsibility for operating/maintaining these areas.
6. The proposal needs to demonstrate compliance with the California Environmental Quality Act (CEQA).

Thank you for the opportunity to comment on the proposed solar collection facility for the 28th Street Landfill. If you have any questions, please call me at (916) 464-4641.



JOHN MOODY
Water Resources Control Engineer
Title 27 Permitting and Mines

cc: Gino Yetka, CalRecycle, Sacramento
John Lewis, Sacramento County Environmental Management Department,
Sacramento
Steve Harriman, City of Sacramento Department of Utilities, Sacramento
Ambrose McCready, SCS Engineers, Sacramento