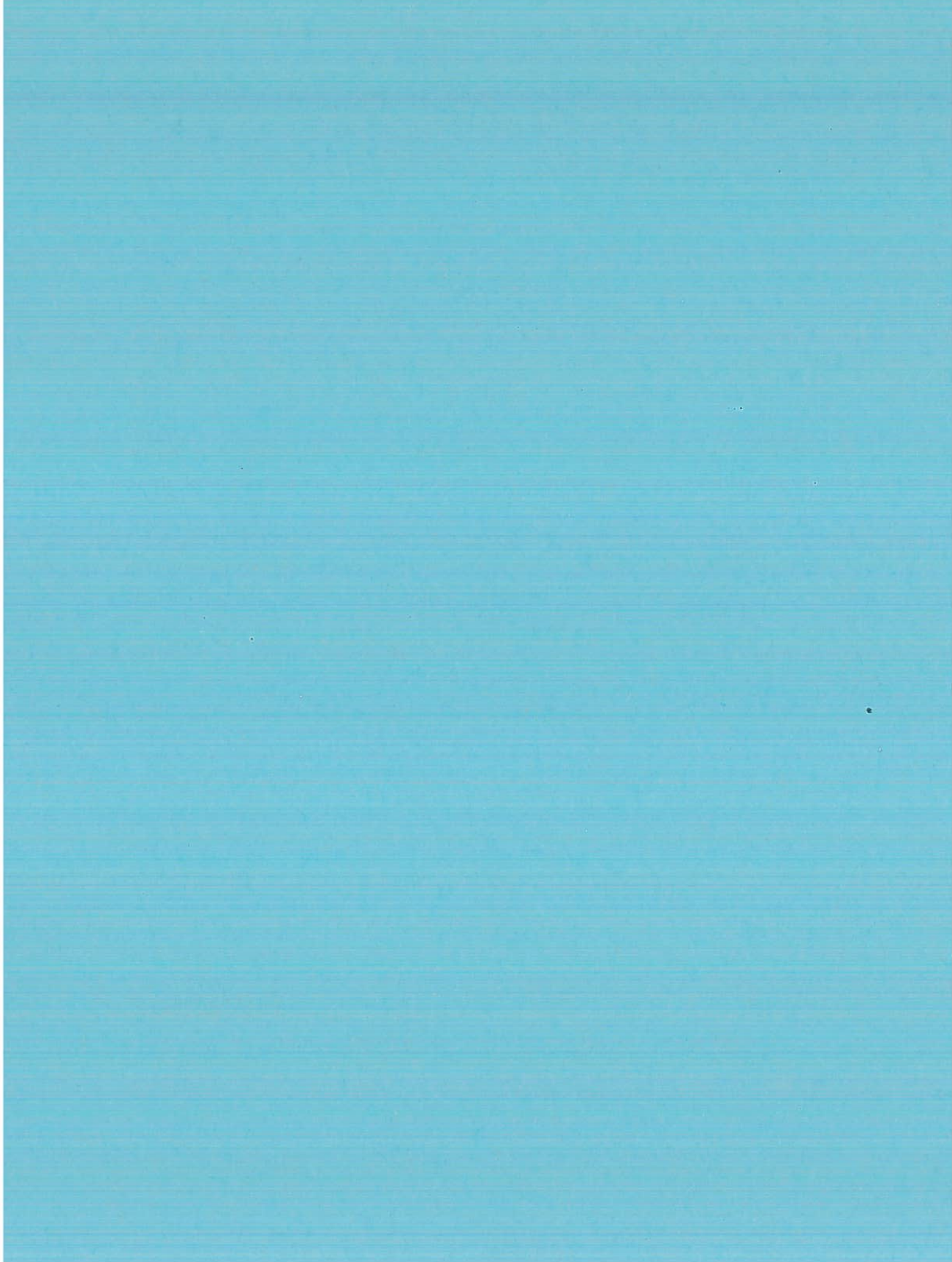


Appendix N

Technical Letter dated September 29, 2005 (response to comments), SCS Engineers



September 29, 2005

Ms. Jennifer McDonald, Senior Planner
City of Orange
Community Services Development
230 East Chapman Avenue
Orange, CA 92866

Via E-Mail: jmcdonald@cityoforange.org

RE: Response to Comments from the County of Orange Health Care Agency Letter of August 30, 2005 Regarding Mitigated Negative Declaration No. 1753-05 (SCH No. 1999101063) for Grijalva Park Extension, Santiago Creek Landfill, SWIS No. 30-CR-0164, City of Orange

Dear Ms. McDonald:

I have reviewed the above referenced document and have spoken with Dean Clarke about the comments. Following is a summary of our conversation to clarify each of the items listed:

Section 2.1 – Project Description, Phase I, page 7: The OCHCA will insist on maintaining the perimeter probes only, VP-1, VP-2 and VP-3, as shown in the Site Plan of the Phase II report. If we cannot preserve them during the construction of the landfill cover, new probes will have to be installed after the cover is placed, close to the same locations. However, VP-3 is located in fill material and may not have to be replaced.

Section 2.1 – Project Description, Phase I, page 7: A simple plan was developed and is included as an attachment to this letter for the excavation and re-depositing of landfill materials located next to Santiago Creek. The plan discusses what we will do with items such as discarded car batteries and the like (if found) and how we will dispose of them off-site. The majority of the material consists of concrete blocks, glass, re-bar, etc....and we don't believe any testing of the materials will be necessary and we don't intend to perform any testing of materials. The waste will be simply removed from the western edge of the landfill and deposited more towards the center of the landfill, in lower lying areas, to make way for the rip-rap barrier.

Section 2.1 – Project Description, Phase I, page 7: The information that Dean wants is included in the Closure Plan/Post Closure Monitoring and Maintenance Plan, Draft 1 dated May 27, 2005 and submitted on June 3, 2005. Dean thought that there was an inconsistency in one of the figures (Figure 4 and Map 1) which shows a cross-sectional view of the landfill cover and the

cover description presented in Section 2.5 of the Closure Plan. We reviewed this and made the necessary change required to the drawings (i.e. the cover depth was revised from 6' to 5'). The modified exhibits are attached to this letter.

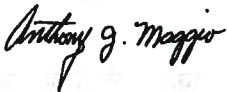
Section 2.3 – Required Agency Approvals, page 10: Based on recent discussions with the OCHCA, CIWMB and the LEA will issue separate comments on the landfill closure plan and will not necessarily work together as one. Based on this new information, a copy of the Closure Plan was sent to Mr. Michael Wochnick with CIWMB who received it via FedEx at his office on September 19th, 2005.

Section 7 – Hazards and Hazardous Materials, Former Landfill, Page 37: The OCHCA acknowledges that no methane gas has been detected at the site, but that they are still required to request this item. Dean stated that the measure can be as simple as monitoring for methane gas over some agreed upon frequency, like quarterly or every 6 months, for some pre-agreed upon time period. Additionally, the City can perform the monitoring itself to save money. The instrument suggested is called the RKI Eagle 401 from Lab Safety Supplies and retails for about \$2,500. SCS can train your people on the use of the instrument. A proposed methane monitoring plan is attached to this letter.

Section 7 – Hazards and Hazardous Materials, Former Landfill, page 37: As above, based on recent discussions with the OCHCA, CIWMB and the LEA will issue separate comments on the landfill closure plan. A copy of the Closure Plan was sent to Mr. Michael Wochnick with CIWMB who received it via FedEx at his office on September 19th, 2005.

If you have questions, please call me at 562-426-9544 Ext. 3020.

Sincerely,



SCS Engineers
Anthony J. Maggio
Project Director

Enclosure: Methane Monitoring Plan
Excavation and Re-Deposition Plan
Modified Figure 4 of the Landfill Closure Plan
Modified Map 1 of the Landfill Closure Plan

Methane Protection Plan
Grijalva Landfill
September 23, 2005

The following plan has been developed to satisfy the request of the Orange County Solid Waste Local Enforcement Agency (LEA) which requested the plan in a letter to Ms. Jennifer McDonald of the City of Orange dated August 30, 2005. As indicated by the LEA, the California Code of Regulations, Title 27 (27 CCR) Section 21190 states that all on-site enclosed structures on or within 1,000 feet of the disposal area shall be protected from methane gas.

The City of Orange will purchase an RKI Eagle 401, which is a hand held methane monitoring instrument. SCS Engineers will train a qualified worker at the Parks Department in the City of Orange how to calibrate and use the instrument.

The City will monitor for methane gas in all enclosed structures and utility vaults, as well as in the perimeter probes, on a quarterly basis for a period of 2 years.

Excavation and Re-Deposition Plan

Grijalva Landfill

September 23, 2005

As part of the work required to install a landfill soil cover at the Grijalva landfill, a rip-rap barrier is proposed to be placed along the western side of the landfill which is adjacent to Santiago Creek. Prior to constructing the rip-rap barrier, waste materials from the landfill which have been eroded by Santiago Creek over the years will have to be removed from the area and re-deposited on the landfill.

The following plan has been developed to satisfy the request of the Orange County Solid Waste Local Enforcement Agency (LEA) which requested the plan in a letter to Ms. Jennifer McDonald of the City of Orange dated August 30, 2005. The items outlined in the plan are those specifically requested by the LEA.

Excavation

The material to be removed consists mainly of concrete, concrete with rebar, metal pipe and posts, and chunks of asphalt. The materials will be excavated using a backhoe, placed into a dump truck and deposited at a location of higher elevation on the landfill. Because there is no municipal solid waste located at this location, wind-blown litter, rodents and odors are not anticipated to be a problem. The site will be watered down if dust is generated during excavation. Additionally, during the excavation portion, an SCS representative will be on site with an organic vapor analyzer calibrated to methane to monitor the site for vapors.

Screening/testing procedure for hazardous waste

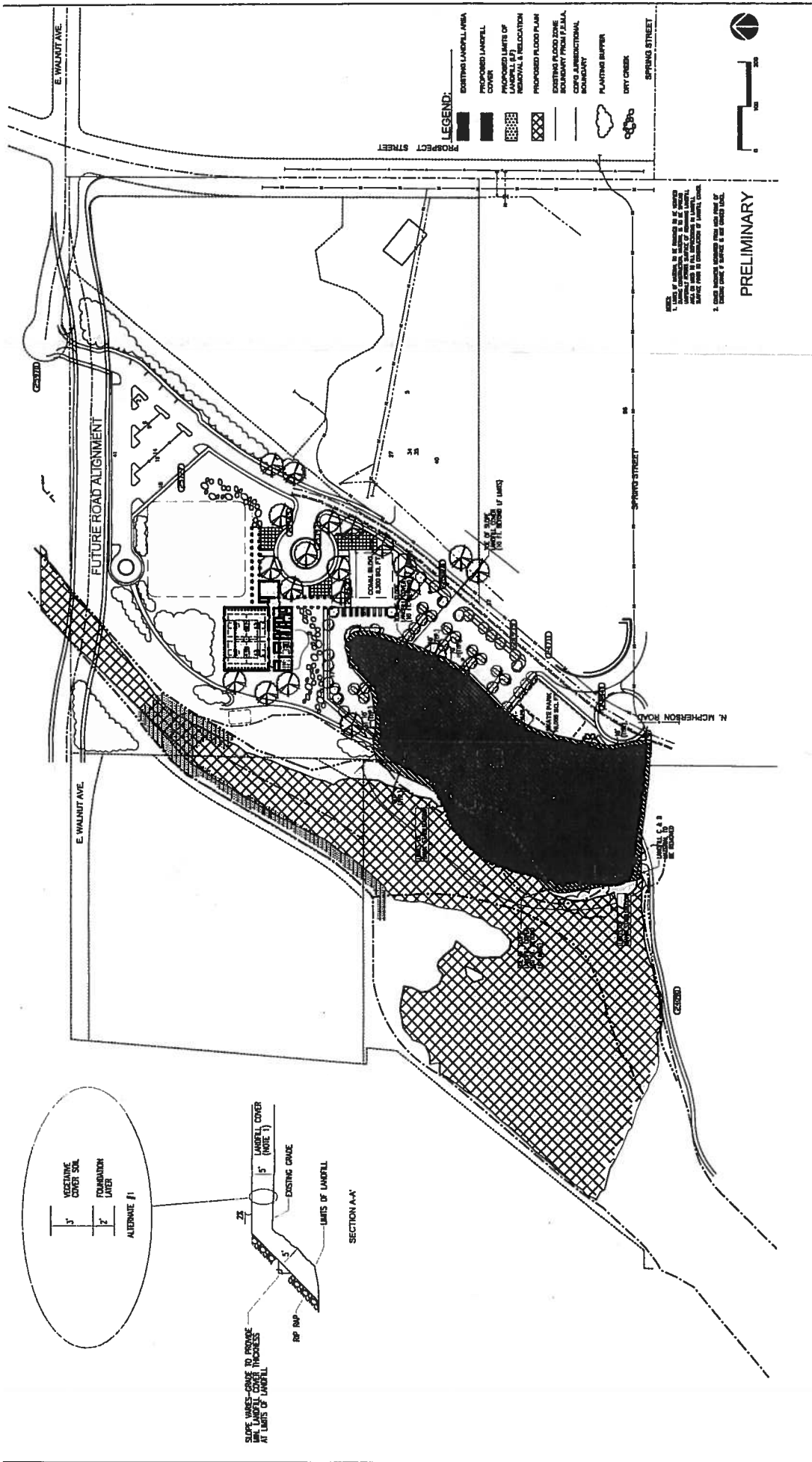
No testing is scheduled for this site. Previous testing of this area had been performed by SECOR during their investigation of December 2000 and January 2001. The results of their testing were published in the following report:

SECOR, January 25, 2001, Environmental Assessment Report – Union Pacific Railroad Property, Santiago Creek Site, North of Spring Street and McPherson Road, Orange, California, Job No. 40236-002-01.

In particular, trench pit 1 (TP-1), which is located in the subject area, was sampled and analyzed as follows:

Lead – 17 mg/kg
Diesel – Not detected
Motor Oil – Not detected
Extractable hydrocarbons – Not detected
Volatile Organic Compounds – Not detected





- LEGEND:**
- EXISTING LANDFILL AREA
 - PROPOSED LANDFILL COVER
 - PROPOSED LIMITS OF LANDFILL (S.T.)
 - PROPOSED FLOOD ZONE
 - PROPOSED FLOOD PLAIN
 - EXISTING FLOOD ZONE
 - BOUNDARY FROM FEMA
 - CITY'S JURISDICTIONAL BOUNDARY
 - PLANTING BUFFER
 - DRY CREEK
 - SPRING STREET

PRELIMINARY

NOTES:
 1. THIS PLAN IS BASED ON THE RECORD AS SHOWN ON THE PREVIOUS PLAN.
 2. THIS PLAN IS BASED ON THE RECORD AS SHOWN ON THE PREVIOUS PLAN.
 3. THIS PLAN IS BASED ON THE RECORD AS SHOWN ON THE PREVIOUS PLAN.

PRELIMINARY

DATE: 12-30-04
 TITLE: LANDFILL COVER AND BANK STABILIZATION - CONCEPT
 FIG. MAP 1

PROJECT: CITY OF ORANGE
 GRIJALVA PARK AT SANTIAGO CREEK

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