

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

ORDER NO.

WASTE DISCHARGE REQUIREMENTS
FOR
LAKE COUNTY PUBLIC SERVICES DEPARTMENT
EASTLAKE SANITARY LANDFILL
CLASS III LANDFILL
CLASS II SURFACE IMPOUNDMENT
CONSTRUCTION, OPERATION, AND CORRECTIVE ACTION
LAKE COUNTY

The California Regional Water Quality Control Board, Central Valley Region, (hereafter Regional Water Board) finds that:

1. The County of Lake, Lake County Public Services Department (hereafter Discharger) owns and operates the Eastlake Sanitary Landfill, a municipal solid waste landfill located on Davis Road at the eastern edge of the City of Clearlake, in Section 26, T13N, R7W, MDB&M, as shown in Attachment A, which is incorporated herein and made part of this Order by reference.
2. The facility consists of one existing unlined waste management unit (Unit) covering 22.4 acres (Area I) and a lined Unit covering 12.3 acres (Area II) of which 6.5 acres was lined during 1999 (Module 1) and 4.8 acres was lined during 2003 (Module 2), as shown in Attachment B, which is incorporated herein and made part of this Order by reference. A 1.0-acre area of Area II, Module 2 remains to be constructed. The facility is comprised of Assessor's Parcel Numbers (APN) 41-221-14,15; 41-222-34; 41-223-24; 41-224-39; 41-225-25; 41-226-17,22,23,24,25; 41-233-28; 41-234-01,23,24; 41-235-11,13,14; 41-244-18; 10-006-84, and 10-008-03,39.
3. The Discharger submitted an 11 July 2006 amended Report of Waste Discharge (RWD) and a 4 August 2006 Report of Disposal Site Information as part of the Joint Technical Document (JTD) for the landfill requesting approval to begin accepting treated wood waste in the lined Area II landfill unit, and to begin accepting non-friable asbestos. The information in the RWD/JTD has been used in writing these waste discharge requirements (WDRs). The RWD/JTD contains the applicable information required in Title 27, California Code of Regulations (CCR), Chapter 4, Subchapter 3, Article 4.
4. On 24 July 1998, the Regional Water Board issued Order No. 98-159, in which the both the unlined and lined landfill Units were classified as a Class III waste disposal site for the discharge of municipal solids waste in accordance with the regulations in effect when the Order was issued. On 6 December 2002, the Regional Water Board rescinded Order No. 98-159 and issued Order No. R5-2002-0217, which approved the Discharger's liner performance

demonstration for the Module 2 side slope liner system for the Area II lined landfill unit that was constructed during 2003. The current Order continues to classify the Units as a Class III landfill that accepts municipal solid waste in accordance with Title 27, CCR §20005, et seq. (Title 27).

5. The facility also includes a 600,000 gallon lined Class II surface impoundment for collection of leachate generated from the landfill Units. The surface impoundment liner system consists of an 80-mil high-density polyethylene (HDPE) geomembrane over a Geonet and gravel leachate collection and removal system (LCRS). The secondary liner system consists of a 40-mil HDPE geomembrane and a geosynthetic clay liner (GCL). The surface impoundment discharges the leachate to the sanitary sewer system that drains to the Southeast Regional Wastewater Treatment Plant.

SITE DESCRIPTION

6. The geologic sequence at the site consists predominantly of the Tertiary-age Cache Formation, which is unconformably underlain by bedrock of the Franciscan Formation. The Cache Formation generally consists of a thick sequence of poorly sorted gravel, silt, clay and sand. Locally occurring lenses of silty sand to clayey silts are located throughout the Cache Formation. At the site, the Franciscan bedrock is primarily comprised of a fractured, weathered fine to medium grained sandstone with some occurrences of siltstone.
7. The closest Holocene faults are approximately two miles northwest (Cross Springs Fault) and two miles west (Clover Valley Fault) of the site. The Maximum Credible Earthquake for these faults range between 6.5 and 6.7 on the Richter scale with a resulting Peak Ground Acceleration (PGA) of 0.58g.
8. Land uses within 1-mile radius of the facility are zoned residential, commercial, agricultural, and open space.
9. The facility receives an average of 27 inches of precipitation per year. The mean pan evaporation is 60 inches per year.
10. The 100-year, 24-hour precipitation event is estimated to be 5.9 inches, based on Lakeport gage, 13N/7W-20, Department of Water Resources "Rainfall Analysis for Drainage Design, No. IA", Bulletin No. 195, October 1976.
11. The waste management facility is not within a 100-year flood plain.
12. There are two domestic groundwater supply wells within one mile of the site.

WASTE AND SITE CLASSIFICATION

13. The Discharger discharges nonhazardous solid waste, including mixed municipal solid waste, construction/demolition debris, and dewatered water treatment sludge to lined and unlined Class III waste management units at the landfill. These classified wastes may be discharged only in accordance with Title 27, CCR, Resolution No. 93-62, and the Code of Federal Regulations, Title 40, Part 258 as required by this Order. The Discharger also discharges landfill leachate to a lined Class II surface impoundment at the landfill. Sewage treatment sludge and septic tank wastewater are not accepted.
14. The Discharger proposes to accept treated wood waste at the lined portion (Area II) of the landfill. "Treated wood" means wood that has been treated with a chemical preservative for purposes of protecting the wood against attacks from insects, microorganisms, fungi, and other environmental conditions that can lead to decay of the wood and the chemical preservative is registered pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 and following). Existing law regulates the control of hazardous waste, but exempts from the hazardous waste control laws, wood waste that is exempt from regulation under the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA), if (a) the wood waste is disposed of in a municipal landfill that meets certain requirements imposed pursuant to the Porter-Cologne Water Quality Control Act for the classification of disposal sites, and (b) the landfill meets other specified requirements outlined in Sections 25143.1.5 and 25150.7 of the Health and Safety Code. Section 25150.8 of the Health and Safety Code also provides that if treated wood waste is accepted by a solid waste landfill that manages and disposes of the treated wood waste in the manner specified, the treated wood waste shall be deemed to be a solid waste, and not a hazardous or designated waste. The Discharger has indicated that all treated wood waste accepted at the landfill will be handled and disposed of in accordance with the provisions outlined in Sections 25143.1.5, 25150.7, and 25150.8 of the Health and Safety Code.
15. The Discharger also proposes to accept non-friable asbestos at the landfill consisting of asbestos waste with less than one percent (<1%) friable asbestos.

SURFACE AND GROUND WATER CONDITIONS

16. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, Fourth Edition (hereafter Basin Plan), designates beneficial uses, establishes water quality objectives, and contains implementation plans and policies for all waters of the Basin.
17. Surface water from the facility drains to Molesworth Creek which is tributary to Clear Lake.
18. The landfill is in the Clear Lake basin near the foothills of the Coast Range. The designated beneficial uses of Clear Lake, as specified in the Basin Plan, are municipal and domestic supply; industrial service supply; agricultural supply; water contact and non-contact water

recreation; spawning, reproduction, and/or early development; warm fresh water habitat; cold fresh water habitat; and wildlife habitat.

19. The first encountered groundwater is about 10 to 30 feet below the native ground surface. The groundwater is unconfined. The depth to groundwater fluctuates seasonally as much as 10 feet.
20. Background monitoring data at MW-3 and MW-9b indicates background groundwater has an electrical conductivity (EC) ranging between 115 and 866 $\mu\text{mhos/cm}$, with total dissolved solids (TDS) ranging between 134 and 467 mg/l.
21. The direction of groundwater flow is toward the southwest (toward Molesworth Creek). The average groundwater gradient is approximately 0.07 feet per foot.
22. The designated beneficial uses of the groundwater, as specified in the Basin Plan, are domestic and municipal water supply, agricultural supply, industrial service supply, and industrial process supply.

OTHER SITE INFORMATION

23. Prior to 1972, a burn dump operated to the west of the present location of the unlined landfill Unit, as shown on Attachment B. The area of the burn dump covered approximately three acres. During 1990, the burn dump was excavated and the material was placed in the unlined landfill Unit.
24. Previously, the landfill accepted empty pesticide containers for disposal at two separate areas, as shown on Attachment B. The first area was used during the early 1970's. During 1989, numerous pesticide containers and contaminated soil were excavated from the pesticide container area. This material was disposed off-site at the Kettleman Hills disposal facility. Confirmation soil samples were collected during 1989 and during additional excavation performed during 1990; the samples indicated pesticides were not present in the surrounding soils. The second pesticide container disposal area accepted triple-rinsed containers until 1988, at which time the area was capped.
25. Leachate collection was implemented at the landfill in 1975 through the installation of a series of plastic pipes set at the base of the unlined Unit to collect and remove leachate. Leachate and spring water commingled at the site of the collection. A cutoff wall was constructed at the base of the unlined Unit to collect the leachate. The leachate and spring water were discharged to Molesworth Creek. In 1982, the Regional Water Board advised the Discharger that a non-compliance condition existed at the landfill with respect to the discharge of leachate to Molesworth Creek. In March 1984, the Discharger began spray discharge of the leachate on a hillside. Leachate for spray discharge was collected from the cutoff wall and from an unlined surface impoundment located below the unlined landfill Unit. This practice was discontinued in 1997 with the completion of the Class II lined

surface impoundment. Leachate continues to be collected from the cutoff wall and conveyed to the Class II surface impoundment where it is stored for discharge to the sanitary sewer.

26. Surface water monitoring is conducted at the site to comply with the Monitoring and Reporting Program and with the General Industrial Storm Water Permit for the facility.

GROUNDWATER MONITORING

27. The groundwater monitoring system for the landfill Units consists of two background wells (MW-3 and MW-9b), two detection monitoring wells (MW-6 and MW-10), and six evaluation/corrective action monitoring wells (MW-1, MW-5, MW-8, MW-11, MW-12, and MW-13). The Point of Compliance wells are MW-5, MW-6, MW-13, and MW-14. Former background monitoring well MW-9a is screened in a different geologic unit than the detection monitoring wells; therefore, the data from this well is not used for calculation of concentration limits.
28. Monitoring wells MW-11 and MW-12 were installed to define the extent of an inorganic plume from the facility consisting primarily of sulfate and high TDS; however, the high sulfate was later found to be naturally occurring based on results of a detailed isotope analysis submitted by the Discharger. Monitoring well MW-10 was installed to define the extent of low levels of 1,1-dichloroethane and chloroethane present in MW-5. Monitoring well MW-13 was installed to evaluate groundwater quality between the unlined portion of the landfill and the Class II surface impoundment. Monitoring well MW-14 was installed as a detection monitoring wells for the lined portion of the landfill. Groundwater degradation is discussed in more detail in later Findings of this Order.
29. The unsaturated zone monitoring system consists of a pan lysimeter located beneath the sump in the lined Area II landfill Unit.
30. Volatile organic compounds (VOCs) are often the primary waste constituents detected in groundwater beneath a municipal solid waste landfill in cases of a release. Since volatile organic compounds are not naturally occurring and thus have no background value, they are not amenable to the statistical analysis procedures contained in Title 27 for the determination of a release of wastes from a Unit.
31. Sections 20415(e)(8) and (9) of Title 27 provide for the non-statistical evaluation of monitoring data that will provide the best assurance of the earliest possible detection of a release from a Unit in accordance with §20415(b)(1)(B)2.-4. of Title 27. However, Title 27 does not specify a specific method for non-statistical evaluation of monitoring data.
32. The Regional Water Board may specify a non-statistical data analysis method pursuant to Section 20080(a)(1) of Title 27. Section 13360(a)(1) of the California Water Code allows the Regional Water Board to specify requirements to protect underground or surface waters

from leakage from a solid waste site, which includes a method to provide the best assurance of determining the earliest possible detection of a release.

33. In order to provide the best assurance of the earliest possible detection of a release of non-naturally occurring waste constituents from a Unit, this Order specifies a non-statistical method for the evaluation of monitoring data.
34. The specified non-statistical method for evaluation of monitoring data provides two criteria (or triggers) for making the determination that there is an indication of a release of non-naturally occurring waste constituents from a Unit. The presence of two non-naturally occurring waste constituents above their respective method detection limit (MDL), or one non-naturally occurring waste constituent detected above its practical quantitation limit (PQL), indicates that a release of waste from a Unit may have occurred. Following an indication of a release, verification testing will be conducted at the same location to determine whether there has been a release from the Unit or the detection was a false detection. Although the detection of one non-naturally occurring waste constituent above its MDL is sufficient to provide for the earliest possible detection of a release, the detection of two non-naturally occurring waste constituents above the MDL as a trigger is appropriate due to the higher risk of false-positive analytical results and the corresponding increase in sampling and analytical expenses from the use of one non-naturally occurring waste constituent above its MDL as a trigger.

GROUNDWATER DEGRADATION, INVESTIGATION, AND CORRECTIVE ACTION

35. Groundwater at the facility has been degraded from landfill activities. Groundwater downgradient from the facility contains low levels of several VOCs and elevated concentrations of chloride and TDS. Elevated concentrations of sulfate are also present downgradient; however, the elevated sulfate and the resulting portion of the elevated TDS have been found to be naturally occurring. The Discharger has been under a corrective action program for the elevated levels of chloride since October 2004 consisting of periodic trend analysis to determine whether chloride concentrations are decreasing as predicted by the Discharger.
36. Low levels of VOCs are currently present in four groundwater monitoring wells at concentrations of less than one microgram per liter. This situation became significantly more evident during 2005 when the VOCs increased significantly in number, and were detected in four wells (MW-5, MW-8, MW-13, and MW-14) up from previously being detected in two wells (MW-5 and MW-13). At the request of Regional Water Board staff, the Discharger began investigating the source and transport mechanism for the VOCs during the Fall of 2005. Although the results showed that soil gas inside and outside of the unlined landfill unit contained high levels of methane and up to 30 VOCs, the Discharger concluded that there was not a clear correlation between the presence of VOCs in soil gas and those in groundwater. During June 2006, Regional Water Board staff approved a work plan

submitted by the Discharger to conduct another investigation to more precisely determine the transport mechanism of VOCs to groundwater (leachate, landfill gas, or both). The investigation consists of installing two groundwater monitoring wells and two landfill gas probes within the unlined landfill and monitoring them quarterly for a one-year period. Following this investigation, the Discharger will analyze the results and assess corrective action options to control the source of the VOCs and remediate impacted groundwater. This Order includes a time schedule for the Discharger to assess the transport mechanism of the VOCs and to implement source control and groundwater remediation.

LINER PERFORMANCE DEMONSTRATION

37. On 15 September 2000 the Regional Water Board adopted Resolution No. 5-00-213 Request For The State Water Resources Control Board To Review The Adequacy Of The Prescriptive Design Requirements For Landfill Waste Containment Systems To Meet The Performance Standards Of Title 27. The State Water Board responded, in part, that “a single composite liner system continues to be an adequate minimum standard” however, the Regional Water Board “should require a more stringent design in a case where it determines that the minimum design will not provide adequate protection to a given body of groundwater.”

In a letter dated 17 April 2001, the Executive Officer notified Owners and Operators of Solid Waste Landfills that “the Board will require a demonstration that any proposed landfill liner system to be constructed after 1 January 2002 will comply with Title 27 performance standards. A thorough evaluation of site-specific factors and cost/benefit analysis of single, double and triple composite liners will likely be necessary. This demonstration will be required regardless of any expansion previously authorized in current waste discharge requirements.”

38. The Discharger constructed Module 2 of Area II during 2003. This expansion is an extension of the Area II liner system up the eastern side slope of Area II. The side slope is inclined at no less than 3H:1V (horizontal to vertical). The liner system design and expansion had been previously approved in Order No. 98-159; however, the Discharger was required to submit a liner performance demonstration for Regional Water Board approval as described in the previous Finding, above.

39. The Discharger submitted a liner performance demonstration report dated 24 September 2002 for Module 2 of Area II which is entirely within the upper side-slope area of Area II. The proposed design for Module 2 of Area II is the same as the previously approved liner system design that was used for Module 1, with the exception of the subdrain layer which the Discharger evaluated and determined was not needed in the upper portion of the side-slope area. Therefore, the liner system for Module 2 of Area II consists of (from top to bottom):

- Two-foot thick soil operations layer;
- LCRS drainage geocomposite;

- 60-mil thick HDPE geomembrane (double-sided textured);
- Geosynthetic clay liner;
- Prepared subgrade

As part of the liner performance demonstration, the consultant for the Discharger reported having performed detailed evaluations of the performance of single-composite liner systems for slopes ranging from 3H:1V to 2H:1V. These demonstrations were completed for the Class II Altamont Landfill, the Class II Western Regional Landfill and for the Class III Neal Road Landfill. Each of the liner performance evaluations indicated that the leakage potentials on these steep side slopes are very low ranging from 2×10^{-4} gallons per acre per day (gpad) to 2×10^{-5} gpad based on leachate generation rates ranging from 25 gpad to 60 gpad. These estimated leakage rates were reported to be considered negligible. Cost-benefit analysis further demonstrated that additional liner components added significant cost, but provided no significant increase in benefit. Based on the information presented in the liner performance demonstration report submitted by the Discharger, the Regional Water Board has found that the proposed side-slope single composite liner system meets the Class III performance standard required by Title 27.

SEISMIC DESIGN

40. Title 27 requires seismic design for Class III units to be based on the Maximum Probable Earthquake (MPE), or the maximum earthquake likely to happen within 100 years. Seismic design for the base liner system at the Eastlake Landfill conducted in 1998 was based on a Peak Ground Acceleration (PGA) with 10% probability of being exceeded in 250 years with a resulting PGA of 0.58g. This seismic design exceeds the required MPE. A different seismic analysis conducted in 2004 was used for design of the filling (side-slopes and benches) and closure of the landfill based on new seismic information at that time. The seismic design for the closure of the landfill has been based on a PGA with a 50% probability of being exceeded in 75 years with a resulting PGA of 0.17g. This design meets the MPE since the resulting PGA would be likely to occur within a period of 100 years (greater than 50% probability of being exceeded).

CONSTRUCTION AND ENGINEERED ALTERNATIVE

41. On 17 June 1993, the State Water Resources Control Board adopted Resolution No. 93-62 implementing a State Policy for the construction, monitoring, and operation of municipal solid waste landfills that is consistent with the federal municipal solid waste regulations promulgated under Title 40, Code of Federal Regulations, Part 258 (Subtitle D).
42. Resolution No. 93-62 requires the construction of a specified composite liner system at new municipal solid waste landfills, or expansion areas of existing municipal solid waste landfills, that receive wastes after 9 October 1993.

43. Resolution No. 93-62 also allows the Regional Water Board to consider the approval of engineered alternatives to the prescriptive standard. Section III.A.b. of Resolution No. 93-62 requires that the engineered alternative liner systems be of a composite design similar to the prescriptive standard.
44. Section 20080(b) of Title 27 allows the Regional Water Board to consider the approval of an engineered alternative to the prescriptive standard. In order to approve an engineered alternative in accordance with §20080(c)(1) and (2), the Discharger must demonstrate that the prescriptive design is unreasonably and unnecessarily burdensome and will cost substantially more than an alternative which will meet the criteria contained in §20080(b), or would be impractical and would not promote attainment of applicable performance standards. The Discharger must also demonstrate that the proposed engineered alternative liner system is consistent with the performance goal addressed by the particular prescriptive standard, and provides protection against water quality impairment equivalent to the prescriptive standard in accordance with §20080(b)(2) of Title 27.
45. Section 13360(a)(1) of the California Water Code allows the Regional Water Board to specify the design, type of construction, and/or particular manner in which compliance must be met in waste discharge requirements or orders for the discharge of waste at solid waste disposal facilities.
46. The Discharger proposes a liner system which will be designed, constructed, and operated in accordance with the criteria set forth in Title 27, and the provisions in State Water Resources Control Board Resolution No. 93-62 for municipal solid wastes.
47. The Discharger submitted a Report of Waste Discharge during 1998 requesting approval of an engineered alternative to liner requirements. The Regional Water Board approved an engineered alternative liner system design for the Area II lined Unit in previous WDRs Order No. 98-159 using GCL in place of two-feet of compacted clay. Module 1 of Area II was constructed during 1999 and included the entire base liner system for Area II, as well as the side slopes up to the first bench. Module 2 of Area II (the remainder of the side slope) was constructed in 2003. The Regional Water Board has routinely approved the substitution of GCLs for the low permeability layer of a landfill liner or cover system. The Discharger was not required to repeat the demonstrations listed in Finding No. 44 because there are no significant differences in the characteristics of already approved GCLs and the low permeability layer substitution proposed for the Area II Unit. Furthermore, GCLs are more suitable for steep side slopes such as the Module 2 side-slope liner extension at the Eastlake Landfill because of the difficulties in compacting a clay liner on a steep side-slope. The issuance of these WDRs constitutes continued Regional Water Board approval of the GCL engineered alternative.
48. The Discharger adequately demonstrated that construction of a Subtitle D prescriptive standard liner would be unreasonable and unnecessarily burdensome when compared to the

proposed engineered alternative design. The Discharger has demonstrated that the proposed engineered alternative is consistent with the performance goals of the prescriptive standard and affords equivalent protection against water quality impairment.

CLOSURE, POST-CLOSURE MAINTENANCE, AND FINANCIAL ASSURANCE

49. The Discharger submitted an updated Preliminary Closure and Post-Closure Maintenance Plan (PCPCMP) dated August 2005. The PCPCMP includes information required by Title 27 CCR Section 21769(b), and includes a lump sum estimate of the cost of carrying out all actions necessary to close each Unit, to prepare detailed design specifications, to develop the final closure and post-closure maintenance plan, and to carry out the first thirty years of post-closure maintenance. The total amount of the closure cost estimate is \$4,366,215 and the amount of the post-closure maintenance cost estimate is \$1,401,805 (for the first 30 years of post-closure maintenance). The Regional Water Board hereby approves these cost estimates. This Order requires that the Discharger maintain financial assurance with the CIWMB in at least the amount of these cost estimates.
50. The Discharger has also submitted a cost estimate for corrective action of all known or reasonably foreseeable releases as required by Title 27 Section 22221. The amount of the approved cost estimate is \$128,300 (approved by the Executive Officer on 21 July 2000). This Order requires that the Discharger maintain financial assurance with the CIWMB in at least the amount of this cost estimate.
51. Title 27 CCR Sections 21780(c)(3) and (d)(1) [sections promulgated by the CIWMB] require the Discharger to submit the final closure and post-closure maintenance plan, or for the closure of discrete units, the partial final closure and post-closure maintenance plan, at least two years prior to the anticipated date of closure. This Order requires that the Discharger obtain WDRs from the Regional Water Board with closure and post-closure maintenance requirements prior to closure.
52. For purposes of estimating closure costs and performing a slope stability analysis as required by Title 27, the August 2005 PCPCMP includes proposed final cover systems, which are as follows:
 - a. For the Area I unlined landfill (from bottom to top): a 12-inch thick compacted soil foundation layer, a 60-mil textured HDPE geomembrane, a geonet composite drainage layer, and a 24-inch thick vegetative soil layer.
 - b. For the Area II lined landfill (from bottom to top): a 12-inch thick compacted soil foundation layer, a GCL layer, a 60-mil textured HDPE geomembrane, and a 24-inch thick vegetative soil layer.

The Discharger's proposed final cover systems include 12-inches of additional soil in the vegetative layer beyond the minimum requirement in Title 27, but 12-inches less in the

foundation layer. Since the purpose of the foundation layer is to provide a stable surface upon which to compact the low permeability compacted clay layer (CCL), and since the Discharger proposes to substitute a geomembrane or GCL for the CCL, a full 24-inch foundation layer is not needed. The Discharger has proposed that this soil should be used for a thicker vegetative layer instead that will, among other things, reduce the probability of failure due to over-saturation and reduce the potential for roots clogging the underlying drainage layer. The Regional Water Board hereby approves the August 2005 PCPCMP.

53. The PCPCMP estimates the final closure of the landfill will occur during the year 2027. Title 27 requires that the Discharger submit the Final Closure and Post-Closure Maintenance Plan (FCPCMP) at least two years before the anticipated closure of the landfill. Closure WDRs should be considered by the Regional Water Board following receipt of the FCPCMP.

CEQA AND OTHER CONSIDERATIONS

54. The County of Lake, Community Development Department, Planning Division certified a Notice of Exemption for the Eastlake Landfill on 30 January 1998 in accordance with the California Environmental Quality Act (Public Resources Code Section 21000 et seq.) and CEQA guidelines (14 CCR Section 15000 et seq.). The Notice of Exemption stated that the project consists of a plan for continued operation of an existing facility, and revisions will not result in new significant adverse environmental impacts.
55. The action to revise waste discharge requirements for this existing facility is exempt from the provisions of the California Environmental Quality Act (CEQA), Public Resource Code §21000, et seq., and the CEQA guidelines, in accordance with Title 14, CCR, §15301.
56. This order implements:
- a. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, Fourth Edition;
 - b. The prescriptive standards and performance goals of Chapters 1 through 7, Subdivision 1, Division 2, Title 27, of the California Code of Regulations, effective 18 July 1997, and subsequent revisions;
 - c. The prescriptive standards and performance criteria of RCRA Subtitle D, Part 258; and
 - d. State Water Resources Control Board Resolution No. 93-62, *Policy for Regulation of Discharges of Municipal Solid Waste*, adopted 17 June 1993.
57. Section 13267(b) of California Water Code provides that: "In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of discharging, or who proposed to discharge within its region, or any citizen or domiciliary, or political agency or entity of this state who had

discharged, discharges, or is suspected of discharging, or who proposed to discharge waste outside of its region that could affect the quality of the waters of the state within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs of these reports, shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.”

58. The technical reports required by this Order and the attached "Monitoring and Reporting Program No. _____" are necessary to assure compliance with these waste discharge requirements. The Discharger owns and operates the facility that discharges the waste subject to this Order.

PROCEDURAL REQUIREMENTS

59. All local agencies with jurisdiction to regulate land use, solid waste disposal, air pollution, and to protect public health have approved the use of this site for the discharges of waste to land stated herein.
60. The Regional Water Board notified the Discharger and interested agencies and persons of its intent to prescribe waste discharge requirements for this discharge, and has provided them with an opportunity for a public hearing and an opportunity to submit their written comments and recommendations.
61. The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the discharge.
62. Any person affected by this action of the Regional Water Board may petition the State Water Resources Control Board to review the action in accordance with Sections 2050 through 2068, Title 23, California Code of Regulations. The petition must be received by the State Water Resources Control Board, Office of Chief Counsel, P.O. Box 100, Sacramento, California 95812, within 30 days of the date of issuance of this Order. Copies of the laws and regulations applicable to the filing of a petition are available on the Internet at http://www.waterboards.ca.gov/water_laws/index.html and will be provided on request.

IT IS HEREBY ORDERED, pursuant to Sections 13263 and 13267 of the California Water Code, that Order No. R5-2002-0217 is rescinded, and that the Lake County Public Services Department, its agents, successors, and assigns, in order to meet the provisions of Division 7 of the California Water Code and the regulations adopted thereunder, shall comply with the following:

A. PROHIBITIONS

1. The discharge of 'hazardous waste' is prohibited. For the purposes of this Order, the term 'hazardous waste' is as defined in Title 23, California Code of Regulations, Section 2510 et seq.
2. The discharge of 'designated waste' anywhere at the facility other than the Class II surface impoundment is prohibited. For the purposes of this Order, the term 'designated waste' is as defined in Title 27.
3. The discharge of wastes outside of a Unit or portions of a Unit specifically designed for their containment is prohibited.
4. The discharge of waste to a closed Unit is prohibited.
5. The discharge of waste constituents to the unsaturated zone or to groundwater is prohibited.
6. The discharge of solid or liquid waste or leachate to surface waters, surface water drainage courses, or groundwater is prohibited.

B. DISCHARGE SPECIFICATIONS

1. Nonhazardous wastes shall be discharged to either:
 - a. The Area I unlined Unit; or
 - b. To the Area II lined Unit which is equipped with a composite liner containment system and a leachate collection and removal system.
2. The discharge shall remain within the designated disposal area at all times.
3. "Treated wood" wastes may be discharged, but only to an area equipped with a composite liner and leachate collection and removal system, as described in Construction Specification D.2, and only if the wastes are handled in accordance with California Health and Safety Code Sections 25143.1.5 and 250150.7. "Treated wood" means wood that has been treated with a chemical preservative for purposes of protecting the wood against attacks from insects, microorganisms, fungi, and other environmental conditions that can lead to decay of the wood and the chemical preservative is registered pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 and following). This may include but is not limited to waste wood that has been treated with chromated copper arsenate (CCA), pentachlorophenol, creosote, acid copper chromate (ACC), ammoniacal copper arsenate (ACA), ammoniacal copper zinc arsenate (ACZA), or chromated zinc chloride (CZC).

4. Treated wood must be managed to ensure consistency with Sections 25143.1.5 and 25150.7 of the Health and Safety Code. If a verified release is detected from the waste management unit where treated wood is disposed, the disposal of treated wood shall be terminated at the unit with the verified release until corrective action ceases the release.
5. Discharge Specifications B.3 and B.4, above, apply only to treated wood waste that is classified as a hazardous waste solely due to the presence of a preservative in the wood, and is not subject to regulation as a hazardous waste under the federal act.

C. FACILITY SPECIFICATIONS

1. The Discharger shall, in a timely manner, remove and relocate any wastes discharged at this facility in violation of this Order.
2. The Discharger shall immediately notify the Regional Water Board of any flooding, unpermitted discharge of waste off-site, equipment failure, slope failure, significant erosion, or other change in site conditions which could impair the integrity of waste or leachate containment facilities or precipitation and drainage control structures.
3. The Discharger shall maintain any disturbed areas, including side-slopes, to prevent erosion in accordance with the Storm Water Pollution Prevention Plan for the landfill.
4. The Discharger shall repair erosion damage or slope failure in a timely manner, and shall immediately provide interim repairs to such damaged areas if permanent repair is not immediately feasible due to wet conditions.
5. Water used for facility maintenance shall be limited to the minimum amount necessary for dust control and construction.
6. The Discharger shall maintain in good working order any facility, control system, or monitoring device installed to achieve compliance with the waste discharge requirements.
7. Methane and other landfill gases shall be adequately vented, removed from the Units, or otherwise controlled as needed to prevent adverse health effects, nuisance conditions, degradation, or the impairment of the beneficial uses of surface water or groundwater due to migration through the unsaturated zone.
8. Surface drainage within the waste management facility shall either be contained on-site or be discharged in accordance with applicable storm water regulations.
9. The Discharger shall maintain a *Storm Water Pollution Prevention Plan and Monitoring Program and Reporting Requirements* in accordance with State Water Resources Control Board Order No. 97-03-DWQ, or retain all storm water on-site.

Surface Impoundment Specifications

10. Surface impoundments shall consist of, described from top to bottom, a 80-mil HDPE geomembrane primary liner, a geonet LCRS on the sidewalls of the pond with a one foot layer of drainage gravel on the bottom of the pond, a 40-mil HDPE geomembrane liner with geosynthetic clay liner (GCL) composite secondary liner, and an appropriate bedding layer. The leachate is drained from the impoundment using a gravity drainage system from the base of the sump.
11. Surface impoundments shall be designed, constructed, and operated to maintain at least two feet of freeboard. At no time shall the freeboard of an impoundment be less than two feet.
12. Surface impoundments shall be designed, constructed, and maintained to prevent scouring and/or erosion of the liners and other containment features at points of discharge to the impoundments and by wave action at the waterline.
13. Leachate removed from a surface impoundment LCRS shall be discharged to the impoundment from which it originated.
14. Solids that accumulate in any surface impoundments shall be periodically removed to maintain minimum freeboard requirements and to maintain sufficient capacity for landfill and surface impoundment leachate and for the discharge of wastes. Prior to removal of these solids, sufficient samples shall be taken for their characterization and classification pursuant to Title 27, Division 2, Subdivision 1, Chapter 3, Article 2. The rationale for the sampling protocol used, the results of this sampling, and a rationale for classification of the solids shall be submitted to Regional Water Board staff for review. The solids may be discharged to the Class III landfill units only if Regional Water Board staff determine that the solids qualify for classification as 'nonhazardous solid waste' or 'inert waste'.

D. CONSTRUCTION SPECIFICATIONS

1. The Discharger shall submit for review and approval **prior to** construction, design plans and specifications for new Units and expansions of existing Units, that include the following:
 - a. A Construction Quality Assurance Plan meeting the requirements of §20324 of Title 27; and
 - b. A geotechnical evaluation of the area soils, evaluating their use as the base layer; and
 - c. An unsaturated zone monitoring system, which is demonstrated to remain effective throughout the active life, closure, and postclosure maintenance periods of the Unit,

- which shall be installed beneath the composite liner system in accordance with §20415(d) of Title 27.
2. The liner system for Module 2 of the Area II Unit shall be constructed in accordance with the following composite liner design (from top to bottom):
 - a. a two-foot thick soil operations layer;
 - b. LCRS drainage geocomposite;
 - c. 60-mil thick HDPE geomembrane (double-sided textured);
 - d. a geosynthetic clay liner that shall exhibit appropriate strength characteristics (hydrated) to accommodate stresses associated with specific landfill design parameters, with particular attention to interface, long-term creep shear, and bearing capacity;
 - e. a subdrain geocomposite drainage layer (if necessary);
 - f. prepared subgrade that is prepared in an appropriate manner using accepted engineering and construction methods so as to provide a smooth surface that is free from rocks, sticks, or other debris that could damage or otherwise limit the performance of the GCL or the HDPE geomembrane.
 3. The Discharger may propose changes to the liner system design prior to construction, provided that approved components are not eliminated, the engineering properties of the components are not substantially reduced, and the proposed liner system results in the protection of water quality equal to or greater than the design prescribed by Title 27 and this Order. The proposed changes may be made following approval by the Executive Officer. Substantive changes to the design require reevaluation as an engineered alternative and approval by the Regional Water Board.
 4. Construction shall proceed only after all applicable construction quality assurance plans have been approved.
 5. Following the completion of construction of a Unit or portion of a Unit, and prior to discharge onto the newly constructed liner system, the final documentation required in §20324(d)(1)(C) of Title 27 shall be submitted for review and approval. The report shall be certified by a registered civil engineer or a certified engineering geologist. It shall contain sufficient information and test results to verify that construction was in accordance with the design plans and specifications, and with the prescriptive standards and performance goals of Title 27.
 6. A third party independent of both the Discharger and the construction contractor shall perform all of the construction quality assurance monitoring and testing during the construction of a liner system.

7. If monitoring reveals substantial or progressive increases of leachate generation above the design leachate flow volume for the Unit or portion of the Unit (landfill or surface impoundment), such that the depth of fluid on any portion of the LCRS (excluding the leachate removal pump sump) exceeds 30 cm, the Discharger shall immediately notify the Regional Water Board in writing within seven days. The notification shall include a timetable for remedial or corrective action necessary to achieve compliance with the leachate depth limitation.
8. The landfill shall be filled with final side slopes with steepness no greater than 3H:1V (3 horizontal to 1 vertical) and shall include, at a minimum, one 15 foot wide bench for every 50 feet in vertical height.
9. Closure shall not proceed without the adoption of closure waste discharge requirements.

E. DETECTION MONITORING SPECIFICATIONS

1. The Discharger shall submit for review and approval a groundwater detection monitoring program demonstrating compliance with Title 27 for any Unit expansion.
2. The Discharger shall comply with the detection monitoring program provisions of Title 27 for groundwater, surface water, and the unsaturated zone, and in accordance with Monitoring and Reporting Program No. _____. A detection monitoring program for a new Unit shall be installed, operational, and one year of monitoring data collected prior to the discharge of wastes [Title 27 CCR Section 20415(e)(6)].
3. The Discharger shall provide Regional Water Board staff a minimum of **one week** notification prior to commencing any field activities related to the installation, repair, or abandonment of monitoring devices, and a minimum 48 hour notification prior to the collection of samples associated with a detection monitoring program, evaluation monitoring program, or corrective action program.
4. The Discharger shall comply with the Water Quality Protection Standard as specified in this Order, Monitoring and Reporting Program No. _____, and the Standard Provisions and Reporting Requirements, dated April 2000.
5. The Water Quality Protection Standard for organic compounds which are not naturally occurring and not detected in background groundwater samples shall be taken as the detection limit of the analytical method used (i.e., US-EPA methods 8260 and 8270). The repeated detection of one or more non-naturally occurring organic compounds in samples above the Water Quality Protection Standard from detection monitoring wells is evidence of a release from the Unit.

6. The concentrations of the constituents of concern in waters passing the Point of Compliance shall not exceed the concentration limits established pursuant to Monitoring and Reporting Program No._____.
7. For each monitoring event, the Discharger shall determine whether the landfill is in compliance with the Water Quality Protection Standard using procedures specified in Monitoring and Reporting Program No._____ and Title 27 CCR Section 20415(e).
8. The Discharger shall submit for review and approval a Sample Collection and Analysis Plan. The Sample Collection and Analysis Plan shall at a minimum include:
 - a. Sample collection procedures describing purging techniques, sampling equipment, and decontamination of sampling equipment;
 - b. Sample preservation information and shipment procedures;
 - c. Sample analytical methods and procedures;
 - d. Sample quality assurance/quality control (QA/QC) procedures; and
 - e. Chain of Custody control.
9. For any given monitored medium, the samples taken from all monitoring points and background monitoring points to satisfy the data analysis requirements for a given reporting period shall all be taken **within a span not to exceed 30 days**, unless a longer time period is approved, and shall be taken in a manner that ensures sample independence to the greatest extent feasible. Specific methods of collection and analysis must be identified. Sample collection, storage, and analysis shall be performed according to the most recent version of USEPA Methods, such as the latest editions, as applicable, of: (1) Methods for the Analysis of Organics in Water and Wastewater (USEPA 600 Series), (2) Test Methods for Evaluating Solid Waste (SW-846, latest edition), and (3) Methods for Chemical Analysis of Water and Wastes (USEPA 600/4-79-020), and in accordance with the approved Sample Collection and Analysis Plan.
10. If methods other than USEPA-approved methods or Standard Methods are used, the exact methodology shall be submitted for review and approval prior to use.
11. The **methods of analysis and the detection limits** used must be appropriate for the expected concentrations. For the monitoring of any constituent or parameter that is found in concentrations which produce more than 90% non-numerical determinations (i.e., “trace” or “ND”) in data from background monitoring points for that medium, the analytical method having the lowest method detection limit (MDL) shall be selected from among those methods which would provide valid results in light of any matrix effects or interferences.

12. **“Trace” results** - results falling between the MDL and the practical quantitation limit (PQL) - shall be reported as such, and shall be accompanied both by the estimated MDL and PQL values for that analytical run.
13. **MDLs and PQLs** shall be derived by the laboratory for each analytical procedure, according to State of California laboratory accreditation procedures. These MDLs and PQLs shall reflect the detection and quantitation capabilities of the specific analytical procedure and equipment used by the lab, rather than simply being quoted from USEPA analytical method manuals. In relatively interference-free water, laboratory-derived MDLs and PQLs are expected to closely agree with published USEPA MDLs and PQLs.
14. If the laboratory suspects that, due to a change in matrix or other effects, the true detection limit or quantitation limit for a particular analytical run differs significantly from the laboratory-derived MDL/PQL values, the results shall be flagged accordingly, along with estimates of the detection limit and quantitation limit actually achieved. **The MDL shall always be calculated such that it represents the lowest achievable concentration associated with a 99% reliability of a nonzero result.** The PQL shall always be calculated such that it represents the lowest constituent concentration at which a numerical value can be assigned with reasonable certainty that it represents the constituent’s actual concentration in the sample. Normally, PQLs should be set equal to the concentration of the lowest standard used to calibrate the analytical procedure.
15. All **QA/QC data** shall be reported, along with the sample results to which they apply, including the method, equipment, analytical detection and quantitation limits, the percent recovery, an explanation for any recovery that falls outside the QC limits, the results of equipment and method blanks, the results of spiked and surrogate samples, the frequency of quality control analysis, and the name and qualifications of the person(s) performing the analyses. Sample results shall be reported unadjusted for blank results or spike recoveries. In cases where contaminants are detected in QA/QC samples (i.e., field, trip, or lab blanks), the accompanying sample results shall be appropriately flagged.
16. Unknown chromatographic peaks shall be reported, flagged, and tracked for potential comparison to subsequent unknown peaks that may be observed in future sampling events. Identification of unknown chromatographic peaks that recur in subsequent sampling events may be required.
17. The statistical method shall account for data below the practical quantitation limit (PQL) with one or more statistical procedures that are protective of human health and the environment. Any PQL validated pursuant to Title 27 CCR Section 20415(e)(7) that is used in the statistical method shall be **the lowest concentration (or value) that can be reliably achieved** within limits of precision and accuracy specified in the WDRs for routine laboratory operating conditions that are available to the facility. The Discharger’s technical report, pursuant to Title 27 CCR Section 20415(e)(7), shall

consider the PQLs listed in Appendix IX to Chapter 14 of Division 4.5 of Title 22, CCR, for guidance when specifying limits of precision and accuracy. For any given constituent monitored at a background or downgradient monitoring point, an indication that falls between the MDL and the PQL for that constituent (hereinafter called a “trace” detection) shall be identified and used in appropriate statistical or nonstatistical tests. Nevertheless, for a statistical method that is compatible with the proportion of censored data (trace and ND indications) in the data set, the Discharger can use the laboratory’s concentration estimates in the trace range (if available) for statistical analysis, in order to increase the statistical power by decreasing the number of “ties”.

18. Background for water samples or soil-pore gas samples shall be represented by the data from all samples taken from applicable background monitoring points during that reporting period (at least one sample from each background monitoring point). The Discharger may propose an alternate statistical method [to the methods listed under Title 27 CCR Section 20415(e)(8)(A-D)] in accordance with Title 27 CCR Section 20415(e)(8)(E), for review and approval.
19. The Discharger may propose an alternate statistical method [to the methods listed under Title 27 CCR Section 20415(e)(8)(A-D)] in accordance with Title 27 CCR Section 20415(e)(8)(E), for review and approval. Upon receiving written approval, alternate statistical procedures may be used for determining the significance of analytical results for common laboratory contaminants (i.e., methylene chloride, acetone, diethylhexyl phthalate, and di-n-octyl phthalate). Nevertheless, analytical results involving detection of these analytes in any background or downgradient sample shall be reported and flagged for easy reference by Regional Water Board staff.
20. The Discharger shall use the following non-statistical method for all analytes that are detected in less than 10% of the background samples. The non-statistical method shall be implemented as follows:
 - a. From the constituent of concern or monitoring parameter list, identify each analyte in the **current** sample that exceeds either its respective MDL or PQL. The Discharger shall conclude that the exceedance provides a preliminary indication of a release or a change in the nature or extent of the release, at that monitoring point, if *either*:
 - 1) The data contains two or more analytes that are detected in less than 10% of background samples that equal or exceed their respective MDLs; or
 - 2) The data contains one or more analyte that equals or exceeds its PQL.

b. **Discrete Retest** [Title 27 CCR Section 20415(e)(8)(E)]:

- 1) In the event that the Discharger concludes (pursuant to paragraph 20.a., above) that there is a preliminary indication of a release, then the Discharger shall immediately notify Regional Water Board staff by phone or e-mail and, within 30 days of such indication, shall collect two new (retest) samples from the monitoring point where the release is preliminarily indicated.
 - 2) For any given retest sample, the Discharger shall include, in the retest analysis, **only the laboratory analytical results for those analytes detected in the original sample**. As soon as the retest data are available, the Discharger shall conclude that there is measurably significant evidence of a release if two or more analytes equal or exceed their respective MDLs or if one or more analyte equals or exceeds its PQL and shall:
 - a) **Immediately** notify the Regional Water Board about any constituent or constituents verified to be present at the monitoring point, and follow up with written notification submitted by certified mail **within seven days** of validation; and
 - b) Comply with ¶21, below if any constituent or constituents were verified to be present.
 - 3) Any analyte that is confirmed per this method shall be added to the monitoring parameter list such that it is monitored during each regular monitoring event.
21. If the Discharger determines that there is measurably significant evidence of a release from the Unit at any monitoring point, the Discharger shall **immediately** implement the requirements of **XI. Response To A Release, C. Release Has Been Verified**, contained in the Standard Provisions and Reporting Requirements.

F. PROVISIONS

1. The Discharger shall maintain a copy of this Order at the facility and make it available at all times to facility operating personnel, who shall be familiar with its contents, and to regulatory agency personnel.
2. The Discharger shall comply with all applicable provisions of Title 27 and 40 Code of Federal Regulations Part 258 (Subtitle D) that are not specifically referred to in this Order.
3. The Discharger shall comply with Monitoring and Reporting Program No. _____, which is incorporated into and made part of this Order.

4. The Discharger shall comply with the applicable portions of the Standard Provisions and Reporting Requirements for Waste Discharge Requirements for Nonhazardous Solid Waste Discharges Regulated by Title 27 and/or Subtitle D (27 CCR §20005 et seq. and 40 CFR 258 et seq.), dated April 2000, which are hereby incorporated into this Order.
5. In the event the Discharger does not comply or will be unable to comply with any prohibition or limitation of this Order for any reason, the Discharger shall notify the appropriate Regional Water Board office by telephone **as soon as** it or its agents have knowledge of such noncompliance or potential for noncompliance, and shall confirm this notification in writing **within two weeks**. The written notification shall state the nature, time, and cause of noncompliance, and shall describe the measures being taken to prevent recurrences and shall include a timetable for corrective actions.
6. All reports and transmittal letters shall be signed by persons identified below:
 - a. For a corporation: by a principal executive officer of at least the level of senior vice-president.
 - b. For a partnership or sole proprietorship: by a general partner or the proprietor.
 - c. For a municipality, state, federal or other public agency: by either a principal executive officer or ranking elected or appointed official.
 - d. A duly authorized representative of a person designated in a, b or c above if;
 - 1) The authorization is made in writing by a person described in a, b, or c of this provision;
 - 2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a Unit, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and
 - 3) The written authorization is submitted to the Regional Water Board.
 - e. Any person signing a document under this Section shall make the following certification:

“I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are

- significant penalties for submitting false information, including the possibility of fine and imprisonment.”
7. The Discharger shall take all reasonable steps to minimize any adverse impact to the waters of the State resulting from noncompliance with this Order. Such steps shall include accelerated or additional monitoring as necessary to determine the nature, extent, and impact of the noncompliance.
 8. The owner of the waste management facility shall have the continuing responsibility to assure protection of waters of the state from discharged wastes and from gases and leachate generated by discharged waste during the active life, closure, and postclosure maintenance period of the Unit(s) and during subsequent use of the property for other purposes.
 9. The fact that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this Order shall not be regarded as a defense for the Discharger’s violations of the Order.
 10. To assume ownership or operation under this Order, the succeeding owner or operator must apply in writing to the Regional Water Board requesting transfer of the Order within 14 days of assuming ownership or operation of this facility. The request must contain the requesting entity’s full legal name, the State of incorporation if a corporation, the name and address and telephone number of the persons responsible for contact with the Regional Water Board, and a statement. The statement shall comply with the signatory requirements contained in Provision F.6. and state that the new owner or operator assumes full responsibility for compliance with this Order. Failure to submit the request shall be considered a discharge without requirements, a violation of the California Water Code. Transfer of this Order shall be approved or disapproved by the Regional Water Board.
 11. The Discharger shall establish cost estimates for initiating and completing corrective action for all known or reasonably foreseeable releases from the landfill, and submit these estimates for review and approval.
 12. The Discharger shall obtain and maintain assurances of financial responsibility for initiating and completing corrective action for all known or reasonably foreseeable releases from the landfill in the amount of the approved cost estimate. The Discharger shall submit the approved cost estimate and proposed financial assurance mechanism meeting the requirements of Chapter 6, Title 27 to the Financial Assurances Section of the California Integrated Waste Management Board (CIWMB). If the CIWMB determines that either the amount of coverage or the mechanism is inadequate, then within 90 days of notification, the Discharger shall submit an acceptable mechanism for at least the amount of the approved cost estimate.

13. The Discharger shall update the preliminary closure and post-closure maintenance plan (PCPCMP) any time there is a change that will increase the amount of the closure and post-closure maintenance cost estimate. The updated PCPCMP shall be submitted to the Regional Water Board, the Local Enforcement Agency, and the CIWMB. The PCPCMP shall meet the requirements of Title 27 CCR Section 21769(b), and include a lump sum estimate of the cost of carrying out all actions necessary to close each Unit, to prepare detailed design specifications, to develop the final closure and post-closure maintenance plan, and to carry out the first thirty years of post-closure maintenance. A final (or partial final) closure and post-closure maintenance plan shall be submitted prior to closure and closure shall not be conducted in the absence of closure WDRs.
14. The Discharger shall obtain and maintain assurances of financial responsibility for closure and post-closure maintenance costs in the amount of the cost estimates in the approved preliminary or final closure and post-closure maintenance plan, as applicable. The Discharger shall submit a proposed financial assurance mechanism for closure and post-closure maintenance meeting the requirements of Chapter 6, Title 27 to the Financial Assurances Section of the CIWMB. If the CIWMB determines that either the amount of coverage or the mechanism is inadequate, then within 90 days of notification, the Discharger shall submit an acceptable mechanism for at least the amount of the approved cost estimate.
15. The Discharger shall complete the tasks contained in these waste discharge requirements in accordance with the following time schedule:

<u>Task</u>	<u>Compliance Date</u>
A. Construction Plans	
Submit construction and design plans for Executive Officer review and approval. (see Construction Specification D.1)	Prior to construction
B. Construction Report	
Submit a construction report upon completion demonstrating construction was in accordance with approved constructed plans for review and approval. (see Construction Specification D.5)	Prior to discharge

<u>Task</u>	<u>Compliance Date</u>
C. Assessment of Transport Mechanism of VOCs	
Submit a technical report presenting the results of the groundwater and soil/landfill gas investigation conducted per the May 2006 work plan and an assessment of the transport mechanism of VOCs to groundwater. The report shall use the data and information available at the time to conclude whether the transport mechanism of VOCs to groundwater is leachate, landfill gas, or both and estimate the relative contribution of each to VOCs being detected in groundwater monitoring wells at the site.	3 December 2007
D. Engineering Feasibility Study (EFS)	
Pursuant to Section 20420(k)(6) of Title 27, submit an EFS containing a detailed description of the potential corrective action measures that could be taken to achieve background concentrations (non-detect) for all VOCs in groundwater at and beyond the Point of Compliance wells (MW-5, MW-6, MW-13, and MW-14). The EFS shall consider source control as a potential corrective action measure.	3 March 2008
E. Corrective Action Program (CAP)	
Pursuant to Section 20430 of Title 27, submit a CAP to implement corrective action measures to achieve background concentrations (non-detect) for all VOCs in groundwater at all Monitoring Points throughout the zone at and beyond the Point of Compliance wells (MW-5, MW-6, MW-13, and MW-14). If applicable, corrective action measures shall include source control.	31 July 2008

I, PAMELA C. CREEDON, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Central Valley Region, on _____.

PAMELA C. CREEDON, Executive Officer

WASTE DISCHARGE REQUIREMENTS ORDER NO.
LAKE COUNTY PUBLIC SERVICES DEPARTMENT
EASTLAKE SANITARY LANDFILL
LAKE COUNTY

-26-

WLB: 8/24/2006