td

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

13 June 2013

Steve Harriman
Integrated Waste General Manager
Department of Utilities, Solid Waste Division
City of Sacramento
2812 Meadowview Road
Sacramento, CA 95832

Douglas Daggs, Trustee
Sylvia Dellar Survivor's Trust
P.O. Box 971
925 North Lake Boulevard, Suite B-301
Tahoe City, CA 96145-0987

REQUEST FOR REPORT OF WASTE DISCHARGE, DELLAR PROPERTY LANDFILL, SACRAMENTO COUNTY

A review of the files and discussion of the compliance status with Central Valley Water Board Compliance and Enforcement Unit staff indicate that the Dellar Property Landfill was recently closed (i.e., covered and graded), but is not currently regulated under waste discharge requirements (WDRs). Given that the landfill has been closed and that Title 27 regulations require ongoing monitoring and maintenance of the closed landfill, permitting staff has determined that the landfill needs to be regulated under WDRs. This letter therefore requests that you submit a completed application and Report of Waste Discharge (RWD) for WDRs for the landfill.

The 29-acre, unlined landfill is along "A" Street west of the 28th Street Landfill. The landfill operated from 1959 to 1963, accepting primarily household waste. The landfill was not subsequently capped and maintained and is a "closed, abandoned, or inactive" (CAI) unit under Section 20080 of Title 27 regulations. In 2008, the Executive Officer issued Cleanup and Abatement Order (CAO) No. R5-2008-0705, requiring that the Discharger submit for approval and implement a Final Closure and Postclosure Maintenance Plan (FC/PCMP) for the landfill. In September 2011, Board staff approved the FC/PCMP submitted under the CAO and in 2012 the landfill was closed. A certification report for the landfill closure was submitted and approved in October 2012.

Section 21710(a) of Title 27 requires that an RWD be submitted to the Regional Board for any discharge of solid waste to land where water quality could be affected by the discharge (e.g., a landfill). The RWD needs to include all information relevant to preparing WDRs for the landfill, including, but not limited to, a description of the site and facility; historical operations information; landfill siting and design; waste and unit classification; monitoring and control systems (e.g., gas, groundwater, storm water); monitoring plans and reports; the Final Closure and Post closure Maintenance Plan; construction and closure certification reports; and financial assurances information. See Chapter 4, Subchapter 3 (i.e., Sections 21710 et seq.).

td

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

13 June 2013

Steve Harriman
Integrated Waste General Manager
Department of Utilities, Solid Waste Division
City of Sacramento
2812 Meadowview Road
Sacramento, CA 95832

Douglas Daggs, Trustee
Sylvia Dellar Survivor's Trust
P.O. Box 971
925 North Lake Boulevard, Suite B-301
Tahoe City, CA 96145-0987

REQUEST FOR REPORT OF WASTE DISCHARGE, DELLAR PROPERTY LANDFILL, SACRAMENTO COUNTY

A review of the files and discussion of the compliance status with Central Valley Water Board Compliance and Enforcement Unit staff indicate that the Dellar Property Landfill was recently closed (i.e., covered and graded), but is not currently regulated under waste discharge requirements (WDRs). Given that the landfill has been closed and that Title 27 regulations require ongoing monitoring and maintenance of the closed landfill, permitting staff has determined that the landfill needs to be regulated under WDRs. This letter therefore requests that you submit a completed application and Report of Waste Discharge (RWD) for WDRs for the landfill.

The 29-acre, unlined landfill is along "A" Street west of the 28th Street Landfill. The landfill operated from 1959 to 1963, accepting primarily household waste. The landfill was not subsequently capped and maintained and is a "closed, abandoned, or inactive" (CAI) unit under Section 20080 of Title 27 regulations. In 2008, the Executive Officer issued Cleanup and Abatement Order (CAO) No. R5-2008-0705, requiring that the Discharger submit for approval and implement a Final Closure and Postclosure Maintenance Plan (FC/PCMP) for the landfill. In September 2011, Board staff approved the FC/PCMP submitted under the CAO and in 2012 the landfill was closed. A certification report for the landfill closure was submitted and approved in October 2012.

Section 21710(a) of Title 27 requires that an RWD be submitted to the Regional Board for any discharge of solid waste to land where water quality could be affected by the discharge (e.g., a landfill). The RWD needs to include all information relevant to preparing WDRs for the landfill, including, but not limited to, a description of the site and facility; historical operations information; landfill siting and design; waste and unit classification; monitoring and control systems (e.g., gas, groundwater, storm water); monitoring plans and reports; the Final Closure and Post closure Maintenance Plan; construction and closure certification reports; and financial assurances information. See Chapter 4, Subchapter 3 (i.e., Sections 21710 et seq.).

Given that the landfill is a CAI unit under Title 27 and was closed as a corrective action measure, the RWD also needs to address the corrective requirements applicable to CAI units under Section 20080 and Chapter 3, Subchapter 3, Article 1 (Sections 20380 through 20430); and the related closure and post closure monitoring requirements of Chapter 3, Subchapter 5 (Sections 20950 et seq.).

Please include with the RWD a completed WDR application form (Form 200) and Water Board JTD index form (copies enclosed). The purpose of the JTD index is to identify the location of the information provided or referenced in the RWD by the applicable Title 27 section. It may be necessary to update or modify the JTD index to reflect the requirements applicable to your site.

Please prepare and submit the above WDR application items for the Dellar Property Landfill by **10 September 2013**. If you have any permitting-related questions, please contact John Moody at (916) 464-4641 or jmoody@waterboards.ca.gov. All compliance and enforcement questions should be directed to Todd Del Frate with the Title 27 Compliance and Enforcement Section at (916) 464-4737 or tdelfrate@waterboards.ca.gov.

VICTOR J. IZZO
Senior Engineering Geologist
Title 27 Permitting and Mining

Enclosures- WDR Application Form
JTD Index Form

cc w/o enclosures:

Glenn Young; Closed, Illegal, and Abandoned Sites; CalRecycle, Sacramento
Patrick Pulupa, Office of Chief Counsel, SWRCB, Sacramento
John Lewis, Sacramento County Environmental Management Department, Sacramento

SWRCB JTD Index

SWRCB Requirement	SWRCB Citation	Related CIWMB Citation	JTD Page Range(s) Fulfilling SWRCB Citation
Chapter 1. General Article 1. Purpose, Scope and Applicability of this Subdivision			
§20080. General Requirements. [engineered alternatives to prescriptive standards]	20080(b-c)		If proposed:
Chapter 3. Criteria for All Waste Management Units, Facilities, and Disposal Sites ** Subchapter 2. Siting and Design ** Article 2. SWRCB - Waste Classification and Management ** §20200. SWRCB - Applicability and Classification Criteria.			
Concept (& describes possible exemption)	20200(a)		if proposed:
Demonstration proposing to allow discharge of a particular waste to a particular landfill of lower classification	20200(a)(1)		if proposed:
Dedicated units/cells for certain wastes	20200(b)-(b)(2)(C)		if proposed:
Waste characterization	20200(c)		
Management of liquids	20200(d)-(d)(3)		
§20220. Nonhazardous Solid Waste.			
Demonstration by discharger	20220(b)-(b)(2)		
Dewatered sludge (describes conditions for discharge)	20220(c)-(c)(3)		If sludge:
Ash (allows discharge of non-hazardous ash to Class III landfills w/o determining of ash is designated waste)	20220(d)		If ash:
Article 3. Waste Management Unit, Facility, or Disposal Site Classification and Siting **			
§20240. Classification and Siting Criteria.	20240		
§20250. Class II: Waste Management Units for Designated Waste.	20250		If Class II:
§20260. Class III: Landfills for Nonhazardous Solid Waste.	20260		If Class III:
Article 4. SWRCB - Waste Management Unit Construction Standards **			
§20310. General Construction Criteria.	20310		
§20320. General Criteria for Containment Structures.	20320		
§20323 & §20324. CQA Plan & Requirements	20323 & 20324		
§20330. Liners.	20330		

SWRCB Requirement	SWRCB Citation	Related CIWMB Citation	JTD Page Range(s) Fulfilling SWRCB Citation
§20340. Leachate Collection and Removal Systems (LCRS).	20340		
§20360. Subsurface Barriers.	20360		If proposed:
§20365. Precipitation and Drainage Controls.	20365		
§20370. Seismic Design.	20370		
§20375. Special Requirements for Surface Impoundments.	20375		If LF facility has SI:
Subchapter 3. Water Monitoring ** Article 1. SWRCB - Water Quality Monitoring and Response Programs for Solid Waste Management Units ** §20380. SWRCB - Applicability.			
Corrective action financial assurance	20380(b)		
Duration of applicability	20380(c)-(c)(2)	21900	
Limitations on engineered alternatives	20380(e)-(e)(3)		
§20385. Required Programs.	20385		
§20390. Water Quality Protection Standard (Water Standard).	20390		
§20395. Constituents of Concern (COCs).			
COCs	20395(a)		
MSW COCs	20395(b)		
§20400. Concentration Limits.			
Proposing COCs	20400(a)-(a)(3)		
Adoption of concentration limits	20400(b)-(b)(3)		
Establishing a CLGB (for corrective action only)	20400(c-h)		
Decreasing a CLGB (in DMP following a CAP)	20400(i)		
§20405. Monitoring Points and the Point of Compliance.	20405(a-b)		
§20410. Compliance Period.	20410(a-c)		
§20415. General Water Quality Monitoring and System Requirements.			
Section applies to all monitoring programs	20415(a)		
G.W. Mon. System (general)	20415(b)-(b)(4)(D)		
Sfc. Water Mon. (general)	20415(c)-(c)(2)(D)		If any:
U.Z. Mon. (general)	20415(d)-(d)(4)		If any:

SWRCB Requirement	SWRCB Citation	Related CIWMB Citation	JTD Page Range(s) Fulfilling SWRCB Citation
Mon. systems designed by RG or RCE	20415(e)(1)		
Logging of borings	20415(e)(2)-(e)(2)(C)		
Shared monitoring system demonstration for contiguous Units	20415(e)(3)		If contig. Units:
Monitoring sample QA/QC	20415(e)(4)-(e)(4)(D)		
Sampling & analytical methods (perf. std. for)	20415(e)(5)		
Monitoring data procurement, analysis, and submittal	20415(e)(6)-(c)(15)		
§20420. Detection Monitoring Program.	20420		
§20425. SWRCB - Evaluation Monitoring Program.	20425	re □(d)(3): 20919 et seq., 21600(b)(8)(E), 21790(b)(8)(E), 21800(c)	If newly-found release:
§20430. Corrective Action Program.	20430		If treating a release:
Subchapter 4. Criteria for Landfills and Disposal Sites Article 2. CIWMB - Daily and Intermediate Cover			
§20705. Standards for Daily and Intermediate (Interim) Cover.	20705		
Subchapter 5. Closure and Post-Closure Maintenance ** Article 1. General Standards For All Waste Management Units **			
§20950. General Closure and Post-Closure Maintenance Standards Applicable to Waste Management Units (Units) for Solid Waste.	20950	re □(f): 21780(a)(3), 21790(b)(1), 21800(c), 21820, 21840	
Article 2. Closure and Post-Closure Maintenance Standards for Disposal Sites and Landfills §21090. Closure and Post-Closure Maintenance Requirements for Solid Waste Landfills.			
Final cover requirements (general)	21090(a)-(a)(2)	21140, 21790(b)(8)(B), 21800(c)	
Erosion control layer	21090(a)(3)-(a)(3)(A)3.	21140, 21150, 21790(b)(8)(D), 21800(c)	
Maintenance (& plan for)	21090(a)(4)-(a)(4)(D)		
Discharges of liquids to covers (leachate & condensate)	21090(a)(5)(A)		

SWRCB Requirement	SWRCB Citation	Related CIWMB Citation	JTD Page Range(s) Fulfilling SWRCB Citation
Discharges of liquids to covers (other liquids)	21090(a)(5)(B)	20800, 21600(b)(8)(D)	
Stability analysis	21090(a)(6)	21145, 21790(b)(8)(B)	
Grading requirements (performance standards)	21090(b)-(b)(3)	20650, 21142(a), 21150, 21600(b)(4)(D), 21790(b)(8)(B)	
General post-closure duties	21090(c)-(c)(5)	**re (c)(2):** 21150, 21160, 21180, 21790(b)(8)(F) // **re (c)(4):** 21600(b)(8)(F)	
Landfill closure deadline & extension	21090(d)	21110, 21790(b)(8), 21800(c)	
Final cover survey(s)	21090(e)-(e)(4)	21142(b)	
Optional clean closure	21090(f)-(f)(2)	21810	
§21132. Landfill Emergency Response Plan Review.	§21132		
§21400. Closure Requirements for Surface Impoundments.	§21400		If LF facility has SI:
§21410. SWRCB - Closure Requirements for Waste Piles.	§21410		If LF facility has WP:
Chapter 4. Documentation and Reporting For Regulatory Tiers, Permits, WDRs, and Plans Subchapter 3. Development of Waste Discharge Requirements (WDRs) and Solid Waste Facility Permits Article 2. CIWMB - Applicant Requirements.			
§21585. SWRCB - Joint Technical Document (JTD). [format for submittal of §21710, §21750, §21760 information]	21585		
Article 4. SWRCB - Development of Waste Discharge Requirements (WDRs) **			
§21710. SWRCB - Report Of Waste Discharge (ROWD) and Other Reporting Requirements. [see also §21585]	21710	re □(c)(1-2): 21145(b), 21200, 21630	
§21720. SWRCB - Waste Discharge Requirements (WDRs).	21720(d-f)	re □(f): 20510, 20515	
§21730. SWRCB - Public Participation. [proposed listing of potentially interested parties]	21730(a)		

SWRCB Requirement	SWRCB Citation	Related CIWMB Citation	JTD Page Range(s) Fulfilling SWRCB Citation
§21740. SWRCB - Waste Characteristics.	21740	re ¶ (a)(1): 21600(b)(2)(A) & (b)(7)(E)	
§21750. SWRCB - Waste Management Unit (Unit) Characteristics and Attributes to be Described in the ROWD.			
Analysis of potential for impairment	21750(a)	21600(b)(4)(A)	
Support for proposed Unit classification	21750(b)	21600(b)(4)(A)	
Listing & incorporation of supporting documents	21750(c)	21600(b)(4)(A)	
Topographic map	21750(d)(1)	21600(b)(4)(A)	
Floodplain analysis	21750(d)(2)-(d)(2)(C)2.	21600(b)(4)(A)	
Climate	21750(e)-(e)(6)	21600(b)(4)(A)	
Geology	21750(f)-(f)(7)	21600(b)(4)(A) // re (f)(5): 21145, 21790(b)(8)(B)	
Hydrogeology	21750(g)-(g)(7)(D)	21600(b)(4)(A)	
Land/Water Use	21750(h)-(h)(5)	21600(b)(4)(A) re ¶(h)(4): 21600(b)(3)(E)	
Preliminary closure plan	21750(i)		
§21760. SWRCB - Design Report and Operations Plan.			
Design Report ¶ preliminary and as-built plans	21760(a)(1)		
Design Report	21760(a)(3)-(a)(4)		
Operation Plan	21760(b)-(b)(3)		
Subchapter 4. Development of Closure/Post-Closure Maintenance Plans §21769. SWRCB - Closure and Post-Closure Maintenance Plan Requirements.			
Prelim. CI/P-CI Plan ¶ purpose	21769(b)(1)		
Prelim. CI/P-CI Plan Contents ¶ cost analysis	21769(b)(2)-(b)(2)(B)5.		
Final CI/P-CI Plan	21769(c)-(c)(2)(H)3.		
Chapter 5. Enforcement Article 4. Enforcement by Regional Water Quality Control Board (RWQCB) **			
§22190. SWRCB - Mandatory Closure (Cease and Desist Orders).	22190(b)		If early closure mandated:

SWRCB Requirement	SWRCB Citation	Related CIWMB Citation	JTD Page Range(s) Fulfilling SWRCB Citation
Chapter 6. Financial Assurances at Solid Waste Facilities and at Waste Management Units for Solid Waste Subchapter 2. Financial Assurance Requirements Article 1. Financial Assurance for Closure			
§22207. SWRCB - Closure Funding Requirements.	22207(a)		
Article 2. Financial Assurance for Postclosure Maintenance			
Article 4. Financial Assurance Requirements for Corrective Action			