

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION**

**MEETING OF OCTOBER 13 AND 14, 2010
BARSTOW, CALIFORNIA**

ITEM: 12

SUBJECT: **AMENDED WASTE DISCHARGE REQUIREMENTS FOR WASTE MANAGEMENT OF CALIFORNIA, INC.; LANCASTER LANDFILL AND RECYCLING CENTER AND GROUNDWATER TREATMENT DISCHARGE, LOS ANGELES COUNTY**

CHRONOLOGY:

January 9, 1987	Updated Waste Discharge Requirements (Order No. 6-87-11)
February 14, 1992	Revised Waste Discharge Requirements (Order No. 6-92-07)
May 14, 1992	Amended Waste Discharge Requirements (Order No. 6-92-07A1)
September 14, 1995	Revised Waste Discharge Requirements (Order No. 6-95-103)
February 6, 1997	Amended Waste Discharge Requirements (Order No. 6-95-103A1)
June 14, 2000	Revised Waste Discharge Requirements (Order No. 6-00-55)

ISSUE: Should the Water Board adopt Amended Waste Discharge Requirements approving an engineered alternative final cover as proposed in the revised Preliminary Closure and Post Closure Maintenance Plan?

DISCUSSION: Waste Management of California, Inc. (WMI) owns and operates the Lancaster Landfill and Recycling Center (LLRC). The LLRC is an active class III landfill facility that receives and stores waste (Landfill).

The Discharger has submitted amendments to the Joint Technical Document and a revised Preliminary Closure and Post Closure Maintenance Plan (PCPCMP) for the Landfill. Revisions to the PCPCMP consisted of a proposal for an engineered alternative final cover, specifically an evapotranspirative (ET) soil cover. The main concept of this type of landfill cover is to store moisture between the soil particles during the rainy season and release that moisture during the dry season through plant uptake and evaporation. Supporting documents submitted as part of the amended JTD package and provided rationale that the ET cover is consistent with the performance goal of the prescriptive final cover, which is to minimize the infiltration of water into the waste.

12-0001

This Order provides Water Board approval of the revised PCPCMP and the proposed engineered alternative final cover. This Order also requires the Discharger to review the plans annually to determine if significant changes in site operations and/or design of the Landfill warrant an update of the plan. The Discharger shall submit an annual report indicating conformance with the existing operations. A Final Closure Post Closure Maintenance Plan (FCPCMP) shall be submitted at least 180 days prior to beginning any partial or final closure activities or at least 120 days prior to discontinuing the use of the site for waste disposal, treatment, or storage, whichever is greater. The Water Board must approve the FCPCMP prior to implementation.

Regional Board staff has solicited comments from the Discharger and interested parties. All comments received have been addressed.

RECOMMENDATION: Adoption of Order as proposed.

Enclosures:

1. Proposed Board Order
2. Comments from Interested Parties
3. Response to Comments

ENCLOSURE 1

12-0003

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

BOARD ORDER NO. 6-00-55A1 (PROPOSED)
WDID NO. 6B190343001

AMENDED WASTE DISCHARGE REQUIREMENTS

FOR
WASTE MANAGEMENT OF CALIFORNIA, INC.
LANCASTER LANDFILL AND RECYCLING CENTER AND
GROUNDWATER TREATMENT DISCHARGE

Los Angeles County

The California Regional Water Quality Control Board, Lahontan Region (Water Board) finds:

1. Discharger

Waste Management of California, Inc. (WMI) owns and operates the Lancaster Landfill and Recycling Center (LLRC) and Groundwater Treatment Discharge. On May 28, 2010, WMI submitted an amended Joint Technical Document (JTD) to support proposed revisions to the Preliminary Closure Post Closure Maintenance Plan (PCPCMP).

WMI has specifically requested that the Water Board amend the existing Waste Discharge Requirements (WDRs) (Board Order No. 6-00-55) for the LLRC to incorporate an engineered alternative final cover into the PCPCMP. The amended JTD provides the necessary support and rationale required by California Code of Regulations (CCR), title 27 section 20080, subsection (b), describing how the construction of the prescriptive standard is not feasible, and that there is a specific engineered alternative that is consistent with the performance goal addressed by the particular construction of the prescriptive standard and that the engineered alternative affords equivalent protection against water quality impairment. The JTD is attached and incorporated by reference into this Water Board Order (Order).

For the purposes of this Order, WMI is referred to as the "Discharger."

2. Facility

The LLRC is an active class III landfill facility that receives and stores waste. For the purposes of this Order, the LLRC is referred to as the "Landfill." The Landfill consists of the existing landfill area, the Western Expansion Area, and the Eastern Expansion Area. The currently permitted waste footprint of the Landfill totals 276 acres. Depth to groundwater beneath the Landfill ranges from 53 feet to 84 feet below ground surface. Groundwater beneath the Landfill has been impacted with

volatile organic compounds. The Discharger has shown that those impacts are attributed to landfill gas migration. Because there is a Corrective Action Program (CAP) to remediate the release from the Landfill, the Discharger is operating a groundwater pump and treatment system at the site of the Landfill to restore groundwater quality. Extracted groundwater is treated and discharged to injection wells located hydrologically cross-gradient (east) of the Landfill, is used for dust control and landscape irrigation at the Landfill, and may be used for emergency fire suppression at the Landfill. The injection well discharge is outside the plume of degraded groundwater. For the purposes of this Order, the Groundwater Treatment System is referred to as the "Treatment System," and collectively, the Landfill and the Treatment System are referred to as the "Facility."

3. Reason for Action

The Water Board is amending the WDRs to incorporate an engineered alternative to the prescriptive final cover into the PCPCMP, as described in Board Order No. 6-00-55, Finding No. 28, as amended.

4. California Environmental Quality Act (CEQA)

This amendment to Board Order No. 6-00-55 is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with CCR, title 23, section 15301. The amendment consists of permitting an existing facility with no expansion of use beyond that already existing, and therefore, fits within the Class 1 exemption, and no exceptions to the exemptions, as set forth in CCR, title 14, section 15300.2, have been identified.

5. Public Notification

The Water Board has notified the Discharger and interested agencies and persons of its intent to amend WDRs for the Facility. The Water Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that the Discharger must comply with the following amended requirements:

1. Add the following as Finding No. 36, Order No. 6-00-55, as amended:

36. This Finding replaces Finding No. 28, Order No. 6-00-55. In April 1999, a PCPCMP was submitted as part of the JTD for the existing landfill area and the Western and Eastern Expansion Areas of the LLRC. The PCPCMP was prepared by Earth Tech, Inc., and generally proposed in-place closure of the waste and monitoring of the unsaturated zone, groundwater, and final cover materials. The PCPCMP included a prescriptive final cover system, the

requirements for which are outlined in CCR, title 27, section 21090, subsection (a). In November 2006 and February 2007, a revised PCPCMP was submitted as part of a JTD update for the Landfill. The updates to the JTD and PCPCMP were made to reflect current conditions at the Landfill and involved no changes to the design and operation of the Landfill.

In May 2010, the Discharger submitted amendments to the JTD and a revised PCPCMP for the Landfill. Revisions to the PCPCMP consisted of a proposal for an engineered alternative final cover, specifically an evapotranspirative (ET) soil cover. The proposed ET cover is a 3-foot thick monolithic cover and proposed for both the lined and unlined portions of the Landfill upon closure. The main concept of this type of landfill cover is to store moisture between the soil particles during the rainy season and release that moisture during the dry season through plant uptake and evaporation. "An Alternative Final Cover Performance Analysis Report," prepared by Geosyntec, was submitted as part of the amended JTD package and provided rationale that the ET cover is consistent with the performance goal of the prescriptive final cover, which is to minimize the infiltration of water into the waste.

Regulations contained in CCR, title 27, section 20080, subsection (b), allows for an engineered alternative provided that the Discharger demonstrates that the construction of prescriptive standard is not feasible and that the engineered alternative is consistent with the performance goal of the prescriptive standard and affords equivalent protection against water quality impairment. Based on the results of the alternative final cover performance evaluation as provided by Geosyntec, the proposed ET cover meets the requirements of CCR, title 27, section 20080, subsection (b), as summarized below:

- a. The prescriptive standard will be unnecessarily burdensome and cost substantially more to construct than the proposed ET cover. The Discharger has identified a suitable on-site soil borrow source for the ET cover. The soils range from silty sand to sandy silty clay, with little to no plasticity. The onsite availability of the soil material translates into a reduction in material costs and transportation-related impacts to the environment. Additionally, ET covers are easier to construct than multi-component prescriptive covers, with no significant potential for construction or installation related damage. Construction cost savings for the proposed ET cover are estimated to be in excess of \$200,000 per acre when compared to the prescriptive standard for the Landfill.
- b. To maximize the "store and release" characteristics of the ET cover, the proposed alternative is designed to utilize the most effective combination of the physical properties of the soil source materials, the native vegetative communities that will be growing on the final cover,

and site-specific climatic conditions. Based on an average rainfall of 7 inches per year, an average evapotranspiration rate of 68 inches per year, and a vegetative cover of 50 percent over the surface area of the cover, the total volume of precipitation that will percolate through the ET cover (the amount of water that does not either evaporate, transpire, or remain in the soil matrix) is estimated to be approximately 0.1 inch per acre per year. This estimation is conservative and does not account for the additional protection against percolation that will be afforded by the 1-foot thick foundation layer that will be placed between the base of the ET cover and the top of the waste. While the theoretical total volume of precipitation that will percolate through a final cover designed to prescriptive standards is considered negligible (less than 0.1 inch per acre per year), the actual amount of percolation is controlled by several variables including defects in the materials (if using a geosynthetic liner), quality control during installation, the plasticity of the soil materials (clayey soils tend to shrink and crack in arid environments and under differential settlement conditions), and post-closure maintenance and repair. Based on site-specific conditions, the proposed ET cover will provide, at minimum, equal performance with respect to minimizing infiltration of water into the waste when compared to the prescriptive standard for the Landfill.

- c. Prescriptive final covers constructed with a low-permeability layer can trap landfill gas thereby resulting in the potential for landfill gas to migrate laterally and vertically and potentially impact groundwater and the vadose zone. ET covers do not significantly affect landfill gas dynamics, but rather will allow for some movement of landfill gas through the cover system. In addition, landfill gas collection and management systems are easier to modify and maintain over an ET cover, with general repairs to the cover being performed by adding soil to restore grade. Maintenance and modifications to landfill gas systems over a prescriptive final cover requires complicated installation to maintain cover integrity and allow for waste settlement. When compared to the prescriptive standard, the proposed ET cover will provide superior protection against water quality impairment from landfill gas migration for the Landfill.

This order approves the proposed engineered alternative evaluated in "An Alternative Final Cover Performance Analysis Report," prepared by Geosyntec and submitted as part of the amended JTD on May 28, 2010. The Water Board also requires the Discharger to review the plans annually to determine if significant changes in the operation of the Landfill warrant an update of the plan.

2. Replace the following as IV. Provisions, D. Closure and Post-Closure, Order No. 6-00-55, as amended:

This Order provides Water Board approval of the amended PCPCMP. The PCPCMP shall be updated if there is substantial change in site operations and/or design. A summary report shall be submitted annually indicating conformance with the existing operations. Pursuant to CCR, title 27, section 21710, subsection (a)(2), a Final Closure Post Closure Maintenance Plan (FCPCMP) shall be submitted at least 180 days prior to beginning any partial or final closure activities or at least 120 days prior to discontinuing the use of the site for waste disposal, treatment, or storage, whichever is greater. The Water Board must approve the FCPCMP prior to implementation.

I, Harold J. Singer, 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, Lahontan Region, on October 14, 2010.

HAROLD J. SINGER
EXECUTIVE OFFICER

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ENCLOSURE 2

12-0009

Jan Zimmerman - RE: AMENDED WASTE DISCHARGE REQUIREMENTS FOR LANCASTER LANDFILL

From: "Stetson, Nicole" <NStetson@wm.com>
To: "Jan Zimmerman" <JZimmerman@waterboards.ca.gov>
Date: 8/17/2010 4:29 PM
Subject: RE: AMENDED WASTE DISCHARGE REQUIREMENTS FOR LANCASTER LANDFILL
CC: "Keener, Laura" <LKeener@wm.com>, <YZemuy@Geosyntec.com>, <JDobrowolski@Geosyntec.com>
Attachments: LLRC Public Hearing Notice Untreated Med Waste 5-17-06.pdf; LEA Response Letter 3-16-07.pdf; BAS Rev Ltr 2-12-07.pdf; BAS Submittal Ltr 5 Yr Review 11-20-06.pdf; LLRC CIWMB 18 Mo. Inspection Report 6-2-06.PDF

Jan,

Per our conversation on Friday, I have a couple of comments to the draft amended WDR for Lancaster:

- Page 1 #2

- o As you are aware, we are not currently utilizing the groundwater treatment system at Lancaster. Since the "Treatment System" is not referred to elsewhere in this document, does not reflect current conditions, and has no bearing on the alternative cap approval, I believe the portion related to the treatment system should be removed.

- Page 2 #1 Finding 36

- o This finding refers only to the April 1999 PCPCMP. As part of the 5-year solid waste facility permit review, this document was updated and submitted to the LEA and RWQCB November 20, 2006 with some additional minor changes submitted February 12, 2007. Attached are documents related to the 5 year review and the following is a summary of what occurred:
 - William Marciniak conducted the 18-month State inspection of the Lancaster Landfill on 6/2/06 (inspection report is attached and provides a good summary as well). Marciniak noted on the report that our original 5 year review submittal of 4/5/05 needed to be updated to include training and procedures for handling untreated medical waste at the site. His report also noted that the groundwater monitoring sections were no longer accurate. A revised permit review application was subsequently submitted however, WM received further direction to complete a thorough review and update of the JTD and PCPCMP's. These revised documents were submitted on 11/20/06 and 2/12/07. The revisions included updates to capacity and site life calculations, operational changes, updated cost estimates along with significant changes to the groundwater monitoring system since the extraction system shut down and CAP Pilot Study Report and subsequent update were submitted to RWQCB.

12-0010

We received approval of the documents from the LEA however have not received anything from your office. This finding should be updated to reflect the subsequent PCPCMP revision.

These will be the only two comments to the draft WDR – Laura Keener and Geosyntec do not have any additional comments.

Please contact me with any questions.

Thanks,
Nicole

From: Rebecca Phillips [mailto:rphillip@waterboards.ca.gov]
Sent: Wednesday, August 04, 2010 2:40 PM
To: Ed Wosika; Leslie Graves; Nadine Langley; Keener, Laura; Stetson, Nicole
Cc: Jan Zimmerman
Subject: AMENDED WASTE DISCHARGE REQUIREMENTS FOR LANCASTER LANDFILL

Attached is the Tentative Lancaster Landfill & Recycling Center amended order which is scheduled for the Oct Board Meeting for your review.

If you should have any questions or comments, please contact Jan Zimmerman at 760 241-7376

Thank you

Rebecca

Rebecca Phillips, Office Technician
(760) 241-7306 - fax: (760) 241-7308
rphillip@waterboards.ca.gov

Waste Management recycles enough paper every year to save 41 million trees. Please recycle any printed emails.

12-0011



COUNTY OF LOS ANGELES
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Public Health

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Acting Director and Chief Medical Officer
DEPARTMENT OF HEALTH SERVICES

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Director of Public Health and Health Officer

Environmental Health
ARTURO AGUIRRE, R.E.H.S., M.A.
Director of Environmental Health

Bureau of Environmental Protection
Solid Waste Management Program/L.A. County LEA
Kenneth Murray, Chief
5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5540 • FAX (626) 813-3022

www.lapublichealth.org

April 19, 2006

Jim Merritt
District Landfill Manager
Waste Management of
Antelope Valley
600 East Avenue F
Lancaster, CA 93535

*Public Hearing
held 5/17/06
2 from City of Lancaster
Residents*

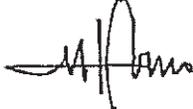
Dear Mr. Merritt:

RE: PROPOSED DETERMINATION FOR LANCASTER LANDFILL & RECYCLING CENTER (LLRC) – SWIS # 19-AA-0050

Pursuant to California Public Resources Code Section 44004, our department is notifying you of our proposed determination to require a revision of the solid waste facilities permit to allow the change. Also, as part of this section's requirement, we will hold a public hearing prior to our final determination. As discussed, the hearing is planned for May 17, 2006. The public hearing will be held at LLRC's conference room. A copy of the public hearing notice has been enclosed and provides all the specifics regarding the hearing.

If you have any questions, please contact me at (626) 430-5540.

Sincerely,



Mark Como
EHS III

Enclosure



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12-0012



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Public Hearing Notice

Proposed Revision of Solid Waste Facility Permit for Lancaster Landfill and Recycling Center

The Los Angeles County Department of Health Services Solid Waste Management Program, acting as the Local Enforcement Agency (LEA), is planning to hold a Public Hearing on the date and time and at the location shown below for the proposed revision of the Solid Waste Facility Permit (SWFP) for Lancaster Landfill and Recycling Center, located at 600 East Avenue F, Lancaster, CA 93535.

The proposed revision to the SWFP would allow procedures and protocol for handling identified untreated medical waste, found at the landfill, to be included in the SWFP. This revision is required by the LEA to comply with a Los Angeles County Board of Supervisors directive addressing untreated medical waste. The revision is also necessary to update current site capacity information.

The Public Hearing is for all interested parties to provide comments on the LEA's proposed action to revise the SWFP for Lancaster Landfill and Recycling Center.

Public Hearing Date and Time: May 17, 2006 at 10:00 a.m.

Public Hearing Location: Lancaster Landfill and Recycling Center
Conference Room
600 East Avenue F
Lancaster, CA 93535

LEA Contact: Mark Como, EHS III

**Public Hearing for
Proposed Revision of the Solid Waste Facility Permit for
Lancaster Landfill and Recycling Center**

May 17, 2006

Agenda

Introduction

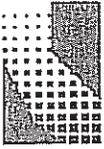
What does a Local Enforcement Agency do?

Purpose of the Public Hearing - AB 1497

Existing Solid Waste Facility Permit

Proposed Revised Solid Waste Facility Permit

Comments/Questions



California Integrated Waste Management Board



Margo Reid Brown, Chair

1001 "T" Street • Sacramento, California 95814 • (916) 341-6000

Mailing Address: P.O. Box 4025, Sacramento, CA 95812-4025

www.ciwmb.ca.gov

Dan Skopec, Acting
Secretary for
Environmental
Protection

Arnold Schwarzenegger
Governor

JUN 14 2006



Mr. Ken Murray, Chief
Los Angeles Co. Dept. of Health Services
Solid Waste Enforcement Agency
5050 Commerce Drive
Baldwin Park, CA 91706-1423

Subject: Transmittal of State Inspection Report
Lancaster Landfill and Recycling Center
Facility File No. 19-AA-0050

Dear Mr. Murray:

Pursuant to Division 30, Public Resources Code (PRC) sections 44019 and 43220, staff of the California Integrated Waste Management Board (CIWMB) conducted a state inspection of the Lancaster Landfill and Recycling Center on June 2, 2006, in conjunction with Mark Como and Chris Mastro of your staff. Two copies of the State Inspection Report are enclosed, one copy is for your file records, and one for transmittal to the facility operator.

The facility was evaluated for compliance with applicable sections of the PRC and with Title 27, California Code of Regulations (27 CCR), Division 2, Chapter 3, Subchapter 4 – Criteria for Landfills and Disposal Sites, and Chapter 4 – Documentation and Reporting for Regulatory Tiers, Permits, WDRs and Plans.

There were no violations observed during the inspection however the following areas of concern were noted:

- 27 CCR 20540 - Roads
- 27 CCR 20690 - Alternative Daily Cover
- 27 CCR 21600 - Report of Disposal Site Information

Board staff appreciates your agency's diligence in pursuing compliance with the regulatory requirements. We are confident that you will work with the operator in addressing the areas of concern identified in this report. Please track the operator's compliance progress in your monthly inspection reports.

Mr. Murray
Page 2

Your Agency's cooperation with Board staff during the recent inspection is appreciated. As always, this office is available to assist you at any point in the compliance process. If you have any questions or comments, please call me at (916) 341-6337, or William Marciniak at (213) 620-2366.

Sincerely,


Suzanne Hambleton, Supervising IWMS
Permitting and Inspection Branch, Region 4
Permitting and Enforcement Division

Enclosure

12-0016

**CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD
STATE INSPECTION REPORT
DISPOSAL SITE**

PAGE 1 OF 4

FACILITY: Lancaster Landfill and Recycling Center	PERMITTED TONNAGE: 1,700 Tons per Day
SWIS #: 19-AA-0050	ACTUAL TONNAGE: 1,493 Tons per Day Average*
INSPECTION DATE: June 2, 2006	SITE TELEPHONE #: (661) 945-4085
LOCATION: 600 East Avenue F, Lancaster	REQUIRED COVER FREQUENCY: Daily
OWNER: Waste Management of California, Inc.	PERMIT ISSUE DATE: September 7, 2000
OPERATOR: Waste Management of California, Inc.	NEXT PERMIT REVIEW: July 31, 2010
LEA: Los Angeles County Department of Health Services	HAZARDOUS WASTES ACCEPTED: None
INSPECTOR: William Marciniak	ACCOMPANIED BY: Mark Como, Chris Mastro, LEA
ACREAGE: 276 Acres *Average from July 1, 2005 to May 23, 2006.	GAS/LEACHATE CONTROLS: Yes/Yes

Comments

The Lancaster Landfill and Recycling Center has been in operation since 1954. It is located approximately two miles northeast of the City of Lancaster in unincorporated Los Angeles County. The area is characterized by wide open desert with sporadic concentrations of structures or dwellings mainly south and west of the site. The landfill generally serves the Lancaster/Palmdale area however waste can be delivered from other areas of the county as well as from Kern, San Bernardino, Riverside, and San Diego Counties.

The operator submitted an application for permit review to the LEA dated April 5, 2005 which resulted in the LEA's Permit Review Report (PRR) of July 31, 2005. This PRR directed the operator to revise their Solid Waste Facility Permit (SWFP) in order to comply with a February 2001 directive from the Los Angeles County Board of Supervisors to include in each disposal site SWFP conditions for notification and training for occurrences of receipt of untreated medical waste. The LEA received the operator's application for permit revision on January 19,

Supervisor 

Waste Management Specialist 

12-0017

2006. The LEA conducted a public hearing for the permit revision on May 17, 2006. Board staff have not yet received a proposed permit. Information is included below in this inspection report in the area of concern for 27 CCR 21600 – Report of Disposal Site Information (RDSI) which is intended to provide direction for additional submittals to the RDSI in order to obtain a complete and correct document. In addition to the requirement for regular RDSI updates for compliance with 27 CCR 21600, the RDSI also needs to be updated prior to the submittal for the permit review as well as for a complete and correct determination by the LEA upon submittal of the application package to the Board for concurrence in the revised SWFP. Since there seems to be only minor changes since the last permit revision an entire RDSI need not be submitted however the RDSI needs to reflect current site conditions.

This eighteen month/pre-permit state inspection of the facility was conducted pursuant to Public Resources Code (PRC) Sections 43219 and 43220 in order to determine compliance with applicable sections of the PRC, California Code of Regulations Title 27, and the terms and conditions of the landfill's SWFP.

There were no violations noted during the inspection.

Areas of Concern

The following areas of concern of Title 27, Division 2, Subdivision 1 of the California Code of Regulations (27 CCR), California Integrated Waste Management Board Regulatory Standards for the Disposal of Solid Wastes (SMS) were noted during the inspection:

27 CCR 20540 – Roads

This standard requires that roads within the permitted facility boundary be kept in a safe condition. Erosion into the west expansion pit area caused a portion of the road along the southern perimeter to wash out. [There is no waste currently being placed in this area.] No barriers or warnings signs were observed. In order to prevent a possible accident there should either be barriers/warning signs placed around the eroded area or the eroded area should be repaired.

27 CCR 20690 – Alternative Daily Cover (ADC)

This standard requires that the alternative cover be placed over the entire working face at the end of each operating day. The operator currently uses Processed Construction & Demolition Waste (C&D), Processed Green Material, and tarps as ADC. In one corner of the tarp used to cover the previous days waste a tear of about 15 feet was noticed with trash observable. Tears in the tarps should be repaired as soon as possible.

27 CCR 21600 – Report of Disposal Site Information (RDSI)

This standard requires that the operator file amendments to the RDSI [or Joint Technical Document (JTD)] when changes occur in order to maintain the SWFP. In the operator's transmittal letter dated April 5, 2005 for the application for Permit Review it indicated that a Joint Technical Document (JTD) amendment covering the minor changes over the last five years was submitted. Included in the JTD amended pages which the Board received was section B.2.2.2, B.5.1, sections C.2.4 – C.2.7, Table 2, a new Emergency Contact List, and revised Waste Discharge Requirements. In 27 CCR 21640 – Review of Permits it requires that the operator submit to the LEA

identification of the proposed changes in design and operation and updated JTD amendments. For disposal sites the JTD amendments are to include an estimate of the remaining site life and capacity as well as an amended closure plan which were not observed in the submittal. In the operator's transmittal letter for the application for Permit Revision dated January 17, 2006 it indicated that only amendments to the JTD regarding medical waste training and notification were submitted. The application for permit revision should have also included the JTD amendments from the submittal for permit review in addition to consideration of the following:

- In section C.2.6 of the JTD it states that, "A groundwater treatment system was installed as part of the Corrective Action Program (CAP)." A letter dated January 22, 2003 from the California Regional Water Quality Board (RWQCB) states they have received a request to decommission the Groundwater Extraction System. An additional letter from the RWQCB dated April 7, 2005 indicates that a CAP through attenuation with continued gas extraction is requested. Based upon these two letters it appears that section C.2.6 may need to be updated as well as section B.5.1.2.
- A letter dated June 30, 2003 from the RWQCB documents receipt of a report entitled "Abandonment of Groundwater Monitoring Wells related to the Western Expansion Activities at the Lancaster Landfill and Recycling Center". If there have been changes in the monitoring wells depicted on drawings of the JTD these drawings and accompanying descriptions in the JTD should be submitted.
- Section C.2.5 of the JTD states, "a leachate collection and removal system has not been constructed along the bottom of the landfill." The LEA inspection report of January 28, 2005 indicated that as of December 21, 2004 the western expansion area had been receiving waste. JTD section C.1.1 identifies a proposed leachate collection and removal system for the expansion areas. Since the leachate collection and removal system is constructed concurrent with the liner which was required prior to placement of waste in the expansion area section C.2.5 should be updated.
- The Board had received a letter from the LEA dated October 22, 2004 regarding a re-circulation of leachate and condensate pilot study. Attached to the letter was a request and plan from WMI to the RWQCB dated October 11, 2004. If recirculation of leachate and condensate is now practiced at the landfill then appropriate sections of the JTD should provide a description.
- A letter from the RWQCB dated May 25, 2004 (additional letter of November 8, 2004 with similar subject) describes changes to the design of the Phase 1A portion of the western expansion area. The letter indicates that the cell base liner has been expanded from 4.8 to 11.6 acres and the leachate collection and recovery system has been redesigned compared to a previously approved design of June 2001. The letter identifies revised JTD sections 2.2, 2.3 and 3.1. These sections should have also been submitted to the LEA as a JTD amendment. Note that if the cell base expansion resulted in an increase or decrease of capacity this needs to be reflected in revised capacity figures.
- Section B.4.4.5.1 of the JTD states that, "seven tarps are maintained on the working face at all times resulting in a tarped area of approximately 125 x 550 feet." Seven tarps were not observed on the day of the inspection. It appears that this operational description may need to be changed since it was written prior to the use of greenwaste and C&D Alternative Daily Cover (ADC). It was observed from tonnage records that an average of 86 tons/day of greenwaste ADC and 256 tons/day of C&D ADC have been utilized during the period from July 1, 2005 to May 23, 2006. If such a large amount of ADC materials are expected to continue then the need for a large tarped area may not be needed "at all times".
- As mentioned in the last state inspection, an updated JTD amendment dated June 8, 2004 was submitted by the operator and accepted by the LEA on July 8, 2004. Page B.4-11 in section B.4.4.5.1 of the updated JTD amendment mentions that the size of the working face is maintained to an area of approximately 150 feet by 150 feet, a green waste density of 500 lbs/cy is assumed, and that the quantity of green waste used for ADC will range from 177 TPD at 6 inches of thickness to 354 TPD at 12 inches of thickness. These figures should be re-

examined. Computation was performed on the figures provided in the updated JTD amendment and revealed the following: (150 feet is 50 yards); 50 yards times 50 yards equals 2,500 square yards. It would require 833.3 cubic yards to supply one foot of greenwaste for the 2,500 square yards. If each cubic yard of greenwaste is 500 lbs/cy then 208 tons would be needed for the one foot thickness and 104 tons would be needed for the 6 inches thickness. A JTD amendment dated April 4, 2005 was also accepted by the LEA on May 6, 2005 for the use of C&D ADC. It states in the amendment that 347 tons of C&D ADC will be needed for a six inch thickness and that 425 tons would be needed for an eighteen inch thickness. Calculations were also performed for C&D usage based upon the information provided in the JTD (working face of 150 x 150; C&D density of 1,000 pounds/cubic yard; and thickness of six and eighteen inches). Calculations show that at six inches approximately 208 tons/day would be needed and that at eighteen inches 625 tons/day would be needed. The JTD amendment quantities for C&D ADC should also be re-examined. For each of these ADCs 27 CCR 20690(a)(11) requires that the owner/operator shall implement a program "described in the RDSP" to minimize contamination of the ADC with wastes not included within the ADC material types. Materials allowed for processed green material ADC are identified in 27 CCR 20690(b)(3)(A) and materials allowed for C&D ADC are identified in 27 CCR 20690(b)(9)(B). A program to minimize the contamination was not observed in either amendment.

- Updated capacity figures were submitted on the application form for the permit review as well as on the application for permit revision however no updated JTD sections were observed. JTD section B.1.5 should be updated to reflect the existing remaining site capacity.
- Section B.1.4.2.2 of the JTD page B.1-4 states that, "Sludge has been accepted at the landfill from the Avenue D Treatment Facility operated by the Sanitation Districts of Los Angeles County since the treatment facility opened." This statement was questioned at the time of the last permit revision but was not resolved. It is believed that grit screenings from the treatment plant had been received but not sludge. The operator should verify whether it is sludge or grit and amend the JTD if necessary.
- Section B.5.2.1.1 of the JTD page B.5-12 states that, "Eighteen nested permanent gas probes, numbered PB-1 through PB-18 were installed in April 1989. The probes are located as shown on Figure 7." During the inspection it was noted that Gas Monitoring Probes PB-13-16 no longer exist since disposal activities have begun in the western expansion area. This section and the figures should be amended to illustrate the existing monitoring system.
- Lastly, section C.3.8 -- Landfill Construction Phasing should be reviewed for correctness or updated since fill activities had not commenced in the western expansion area until December 21, 2004. In the first paragraph of the introduction it states that, "The Order (WDR Order No. 6-95-103A1) mandates that the discharger cease discharging waste to the unlined areas of the LLRC no later than August 1, 2000

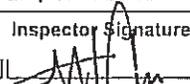
The information above should be assessed and an amendment to the JTD be compiled to update the document in order that the LEA can make a completeness determination. In addition to the items mentioned the operator should review the JTD with the site operations and verify whether other design or operational changes have occurred that are not mentioned above and which are not accurately reflected in the JTD.

Conclusion

Overall site operations appear satisfactory. The LEA should work with the operator to address the above areas of concern. The cooperation of site personnel was greatly appreciated.

Addendum to Inspection Report

Blue or Black Ink Pen

Enforcement Agency: COUNTY OF LOS ANGELES-SOLID WASTE MANAGEMENT		For Official CIWMB Use Only	
FACILITY FILE NUMBER 19-AA-0050	INSPECTION DATE (MM/DD/YYYY) 06/02/2006	Received Date	
Facility Name LANCASTER LANDFILL & RECYCLING CENTER			
Facility Location 600 EAST AVENUE F LANCASTER, CA 93535			
Inspector MARK COMO	Inspector Signature 		
Comments			

* CIWMB 18 MONTH INSPECTION CONDUCTED BY BILL MARCINIAK

THE FOLLOWING AREAS OF CONCERN WERE OBSERVED AT THE TIME OF INSPECTION:

* 20654 (ROADS): PROVIDE ON-SITE ROADS THAT ARE MAINTAINED IN SAFE CONDITIONS AND IN GOOD REPAIR. AN ON-SITE ROAD AT THE SOUTH SIDE OF THE WEST EXPANSION AREA WAS DAMAGED BY EROSION. A BARRIER AND WARNING SIGN SHOULD BE ESTABLISHED UNTIL REPAIRS HAVE BEEN COMPLETED.

* 20690 (ADC): PROVIDE AND APPLY ADC TO EFFECTIVELY COVER THE ENTIRE WORKING FACE AT THE END OF EACH OPERATING DAY. A DARK GREEN TARP WAS OBSERVED TO HAVE A 15-18 FOOT TEAR IN ITS CORNER. THE TEAR WAS LARGE AND WIDE ENOUGH TO EXPOSE TRASH FROM THE PREVIOUS DAYS OPERATION.

* 21600 (RDSI): PROVIDE AMENDMENTS TO THE RDSI (OR JTD) WHEN CHANGES OCCUR IN ORDER TO MAINTAIN THE SWFP. AMENDMENTS TO THE JTD DO NOT EXIST OR HAVE NOT BEEN SUBMITTED FOR ALL THE LANDFILL CHANGES SINCE THE LAST 5 YEAR PERMIT REVIEW. (REFER TO EXAMPLES DESCRIBED IN THE STATE INSPECTION REPORT DATED 06/02/2006)

THE FOLLOWING ITEMS WERE REVIEWED AND FOUND TO BE SATISFACTORY:

- * DAILY LOADCHECKS
- * TONNAGE REPORTS
- * SAFETY AND TRAINING RECORDS
- * COMPLAINT LOG



WASTE MANAGEMENT

600 East Avenue F
Lancaster, CA 93535
(661) 945-4085
(805) 945-2269 Fax

November 20, 2006

Mr. Stan Uyehara
County of Los Angeles
Department of Health Services
Solid Waste Management Program
5050 Commerce Drive, 1st Floor
Baldwin Park, California 91706

RE: Submittal of Application for Five Year Review of SWFP for Lancaster Landfill and Recycling Center – SWIS #19-AA-0050

Dear Mr. Uyehara,

In accordance with California Code of Regulations (CCR), Title 27 requirements, Waste Management is pleased to submit two (2) copies of the Application for Five Year Review for the Solid Waste Facilities Permit (SWFP) for the Lancaster Landfill and Recycling Center.

As required by 27 CCR 21570(f), the following information is included, either as an attachment, or by reference to the previously submitted JTD:

Joint Application Form

An application form (E-1-77) has been completed, signed and dated for the Five Year Review (Attachment 1).

JTD Amendment

An amendment to the JTD covering changes at the LLRC over the last five years, including issuance of a revised WDR by the Lahontan RWQCB, is attached (Attachment 2). The document is presented in whole in two volumes due to the amount of changes and the pagination changes. A copy of the amended text pages in revision mode (strike through and underline) are included in the pocket of Volume I for ease in your review of the changes made to the JTD. Changes have also been made to some figures, drawings and tables; however, a revision format is not available for these items.

California Environmental Quality Act (CEQA) Compliance

No changes to the design and operation of the facility are proposed as a part of this Five Year Review application and there is, therefore, no project under CEQA.

Mr. Stan Uyehara

RE: Submittal of Application for Five Year Review of SWFP for Lancaster Landfill and Recycling Center –
SWIS #19-AA-0050

November 20, 2006

Page 2 of 2

Los Angeles County Integrated Waste Management Plan (CIWMP) Conformance

The Lancaster Landfill and Recycling Center is included in the Siting Element of the Los Angeles County Integrated Waste Management Plan (CIWMP) on pages 7-5, 7-8, 7-11, 7-20, 7-21 and Figure 7-6, and is therefore in compliance with this requirement (see Attachment 3).

Completeness Determination of Preliminary Closure/Post Closure Maintenance Plan (PCPMP)

The PCPMP, included as part of the previously submitted JTD for the expansion project, was deemed complete by all agencies. However, the PCPMP has been revised to reflect applicable changes made in the JTD. Included herein is the revised PCPMP as Attachment 4. A copy of the amended text pages in revision mode (strike through and underline) are included in the pocket of the document for ease in your review of the changes made to the PCPMP. Changes have also been made to some figures, drawings and tables; however, a revision format is not available for these items.

Closure and Post-Closure Maintenance Financial Assurance Documentation

The financial assurance mechanisms and funding levels currently in place for necessary closure and post-closure maintenance activities are included in Attachment 5.

Operating Liability Requirements

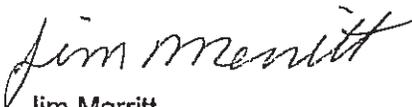
Operating Liability requirements have been met by the facility as documented in the attached letter from the CIWMB's Financial Assurance section (Attachment 6)

Conditional Use Permit/Mitigation Monitoring

This facility was issued a Conditional Use Permit along with a Mitigation Monitoring Program by the Los Angeles County Planning Department for the landfill expansion project, copies of which have been previously submitted to your agency and are included in Appendix C (Volume II) of the JTD.

If you have any questions regarding this submittal, please contact me at (661) 726-3469.

Sincerely,



Jim Merritt
District Landfill Manager
Waste Management - LLRC

c: Christy Hunter – RWQCB



WASTE MANAGEMENT

600 East Avenue F
Lancaster, CA 93535
(661) 945-4085
(805) 945-2269 Fax

February 12, 2007

Mr. Stan Uyehara
County of Los Angeles
Department of Health Services
Solid Waste Management Program
5050 Commerce Drive, 1st Floor
Baldwin Park, California 91706

RE: Submittal of Application for JTD Amendment for Lancaster Landfill and Recycling Center – SWIS #19-AA-0050

Dear Mr. Uyehara,

Pursuant to your request during a conversation with Paul Willman of Bryan A. Stirrat and Associates on February 1, 2007, Waste Management hereby withdraws the previously submitted application for Five Year Review for the Solid Waste Facilities Permit (SWFP) for the Lancaster Landfill and Recycling Center and replaces it with the attached application for a Joint Technical Document (JTD) Amendment. The purpose of the amendment is to update the document as directed by the California Integrated Waste Management Board and your agency to reflect certain administrative changes such as the issuance of new WDRs and make some editorial changes such as addressing the previously permitted expansion in the present tense rather than the future tense. In accordance with California Code of Regulations (CCR), Title 27 requirements, Waste Management is pleased to submit two (2) copies of the application. All attachments transmitted to you as part of the previous Five Year Review submittal are to be considered the attachments to this current application.

As required by 27 CCR 21570(f), the following information was included, either as an attachment to the previously submitted application for Five Year Review, or by reference to the original JTD:

JTD Amendment

An amendment to the JTD covering administrative updates and other minor edits, including issuance of a revised WDR by the Lahontan RWQCB was attached (original attachment 2). The document was presented in whole in two volumes due to the amount of changes and the pagination changes. A copy of the amended text pages in revision mode (strike through and underline) was included in the pocket of Volume I for ease in your review of the changes made to the JTD. Changes were also made to some figures, drawings and tables; however, a revision format was not available for these items.

California Environmental Quality Act (CEQA) Compliance

No changes to the design and operation of the facility are proposed as a part of this JTD Amendment application and there is, therefore, no project under CEQA.

Los Angeles County Integrated Waste Management Plan (CIWMP) Conformance

The Lancaster Landfill and Recycling Center is included in the Siting Element of the Los Angeles County Integrated Waste Management Plan (CIWMP) on pages 7-5, 7-8, 7-11, 7-20, 7-21 and Figure 7-6, and is therefore in compliance with this requirement (Attachment 3 of original application).

Completeness Determination of Preliminary Closure/Post Closure Maintenance Plan (PCPMP)

The PCPMP, included as part of the previously submitted JTD for the expansion project, was deemed complete by all agencies. However, the PCPCMP (original Attachment 4) was revised to reflect applicable changes made in the JTD. A copy of the amended text pages in revision mode (strike through and underline) were included in the pocket of the document for ease in your review of the changes made to the PCPCMP. Changes were also made to some figures, drawings and tables; however, a revision format is not available for these items.

Closure and Post-Closure Maintenance Financial Assurance Documentation

The financial assurance mechanisms and funding levels currently in place for necessary closure and post-closure maintenance activities were included in the original Attachment 5.

Operating Liability Requirements

Operating Liability requirements have been met by the facility as documented in the previously attached letter from the CIWMB's Financial Assurance section (original Attachment 6).

Conditional Use Permit/Mitigation Monitoring

This facility was issued a Conditional Use Permit along with a Mitigation Monitoring Program by the Los Angeles County Planning Department for the landfill expansion project, copies of which have been previously submitted to your agency and are included in Appendix C (Volume II) of the JTD.

If you have any questions regarding this submittal, please contact me at (661) 726-3469.

Sincerely,



Jim Merritt
District Landfill Manager
Waste Management - LLRC

cc: Christy Hunter - RWQCB

APPLICATION FOR SOLID WASTE FACILITY PERMIT/WASTE DISCHARGE REQUIREMENTS

CIWMB E-1-77 (Rev. 8-84)

NOTE: This form has been developed for multiple uses. It is the transmittal sheet for documents required to be submitted to the appropriate agency. Please refer to the attached instructions for definitions of terms and for completing this application form in a complete and correct manner.

FOR OFFICIAL USE ONLY			
SWIS NUMBER:	FILING FEE:	RECEIPT NUMBER:	DATE RECEIVED:
DATE ACCEPTED:	DATE REJECTED:	ACCEPTANCE DATE OF INCOMPLETE APPLICATION:	DATE DUE:

Part 1. GENERAL INFORMATION

A. ENFORCEMENT AGENCY: County of Los Angeles Dept. Health Services/LEA	B. COUNTY: Los Angeles
---	---------------------------

C. TYPE OF APPLICATION (Check one box only):

- | | |
|--|--|
| <input type="checkbox"/> 1. NEW SWFP and/or WDRS | <input type="checkbox"/> 4. PERMIT REVIEW |
| <input type="checkbox"/> 2. REVISION OF SWFP and/or WDRS | <input type="checkbox"/> 5. AMENDMENT OF APPLICATION |
| <input type="checkbox"/> 3. EXEMPTION and/or WAIVER | <input checked="" type="checkbox"/> 6. RFI/ROWD/JTD AMENDMENTS |

Part 2. FACILITY DESCRIPTION

A. NAME OF FACILITY: Lancaster Landfill and Recycling Center

B. LOCATION OF FACILITY:

1. PHYSICAL ADDRESS OR LOCATION AND ZIP CODE: 800 E. Avenue F Lancaster, CA 93535

2. LATITUDE AND LONGITUDE: LAT 34.7481; LONG 118.1175

3. The NE 1/4 of Sect. 35 and the N 1/2 of the NW 1/4 of sect. 36 and the S 30 acres of the NW 1/4 of the NE 1/4 of section 36, Township 8 N, Range 12 W, San Bernardino Meridian

C. TYPE OF ACTIVITY: (Check applicable boxes):

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> 1. DISPOSAL
a. TYPE: Class III | <input type="checkbox"/> 3. TRANSFORMATION | <input type="checkbox"/> 5. OTHER (describe): |
| <input type="checkbox"/> 2. COMPOSTING
a. TYPE: | <input type="checkbox"/> 4. TRANSFER/PROCESSING FACILITY
<input type="checkbox"/> CHECK HERE IF RECYCLABLE MATERIALS ARE RECOVERED PRIOR TO TRANSFER/PROCESSING. | |

D. CONFORMANCE FINDING INFORMATION (CIWMP):

1. FACILITY IS IDENTIFIED IN (Check one):
- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> SITING ELEMENT | DATE OF DOCUMENT: 1997 CIWMP app. by CIWMB 8/98 | PAGE # 7-8, 7-9, 7-11, 7-20, 7-21 and Figure 7-8 |
| <input type="checkbox"/> NONDISPOSAL FACILITY ELEMENT | DATE OF DOCUMENT: | |

2. FACILITY IS NOT REQUIRED TO BE IDENTIFIED IN SITING ELEMENT OR NONDISPOSAL FACILITY ELEMENT

E. TYPE OF PERMITTED WASTES TO BE RECEIVED: (Check applicable boxes):

- | | | |
|--|--|---|
| <input type="checkbox"/> 1. AGRICULTURAL | <input checked="" type="checkbox"/> 6. CONSTRUCTION/DEMOLITION | <input type="checkbox"/> 11. LIQUIDS |
| <input checked="" type="checkbox"/> 2. ASBESTOS <input type="checkbox"/> Friable <input checked="" type="checkbox"/> Non-friable | <input checked="" type="checkbox"/> 7. CONTAMINATED SOILS | <input checked="" type="checkbox"/> 12. MIXED/MUNICIPAL SOLID WASTE |
| <input type="checkbox"/> 3. ASH | <input type="checkbox"/> 8. DEAD ANIMALS | <input checked="" type="checkbox"/> 13. SEWAGE SLUDGE |
| <input checked="" type="checkbox"/> 4. AUTO SHREDDER | <input checked="" type="checkbox"/> 9. INDUSTRIAL | <input type="checkbox"/> 14. TIRES |
| <input checked="" type="checkbox"/> 5. COMPOSTABLE MATERIAL (describe): green waste | <input checked="" type="checkbox"/> 10. INERT | <input type="checkbox"/> 15. OTHER (describe): |

Part 3. FACILITY INFORMATION

A. PROPOSED CHANGE (Check applicable box(es))

- 1. DESIGN (describe): _____
- 2. OPERATION (describe): _____
- 3. OWNER, OPERATOR, ADDRESS, AND/OR FACILITY NAME CHANGE (describe): _____
- 4. OTHER (describe): No changes proposed; Administrative and other minor JTD edits submitted per CIWMB/LEA request.

B. FACILITY INFORMATION:

1. INFORMATION APPLICABLE TO ALL FACILITIES:

- a. PEAK DAILY TONNAGE OR CUBIC YARDS: 2,754 tpd (does not include categories that don't have peaks listed in JTD).
 - 1) DISPOSAL/TRANSFER (unit) 1,700 tpd
 - 2) OTHER (unit) C&D Transfer for recyc. 200 tpd. ADC (curbside greenwaste 416 tpd; C&D 1,249*) 1,665 tpd total
*green/woodwaste 400 tons per mo. Avg; Concrete/asphalt 57 tpd avg. TPH soil; 80,000 tpy; curbside recyc. 1,250 tons per month.
- b. DAILY DESIGN TONNAGE (TPD): 1700 tpd for disposal
- c. FACILITY SIZE (acres): 276 acres
- d. PEAK TRAFFIC VOLUME PER DAY (vpd): 900
- e. DAYS AND HOURS OF OPERATION: Landfill and ancillary operations Mon- Sat 5am to 10pm. Receipt of refuse Mon-Sat 5am to 8pm.

2. ADDITIONAL INFO. REQUIRED FOR COMPOSTING FACILITIES ONLY:

- a. SITE STORAGE CAPACITY (cu yds) _____

3. ADDITIONAL INFORMATION REQUIRED FOR LANDFILLS ONLY:

- a. AVERAGE DAILY TONNAGE (TPD): 1,360 tpd
- b. SITE CAPACITY CURRENTLY PERMITTED (Airspace) (cu yds): 27.7 million cy gross
- c. SITE CAPACITY PROPOSED (Airspace) (cu yds): No change
- d. SITE CAPACITY USED TO DATE (Airspace) (cu yds): 8.6 million cy
- e. SITE CAPACITY REMAINING (Airspace) (cu yds): 17.3 million cy net (excludes liner [1.4 mcy] and final cover [1.4 mcy])
- f. DATE OF CAPACITY INFORMATION (Date) (See instructions): December 31, 2006
- g. LAST PHYSICAL SITE SURVEY (Date): November 2005
- h. ESTIMATED CLOSURE DATE (month and year): January 2031 (at 1,700 tpd) and January 2038 (at 1,360 tpd)
- i. DISPOSAL FOOTPRINT (acres): 209 acres
- j. SITE CAPACITY PLANNED (cu yds): No change
- k. 1. (i) IN-PLACE WASTE DENSITY (lbs of waste per cu yd of waste) _____
AND
(ii) WASTE-TO-COVER RATIO (Estimated) (v:v) _____
OR
2. AIRSPACE UTILIZATION FACTOR (tons of waste per cu yd of landfill airspace): 0.76

Part 4. SOURCE OF WATER SUPPLY (Check applicable boxes)

- A. MUNICIPAL OR UTILITY SERVICE: _____
- B. INDIVIDUAL (wells): _____
- C. SURFACE SUPPLY:
 - 1. NAME OF STREAM, LAKE, ETC. _____
 - 2. TYPE OF WATER RIGHTS:
 - RIPARIAN
 - APPROPRIATION
 - 3. STATE PERMIT OR LICENSE NUMBER, IF APPLICABLE _____

Part 5. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) (Check applicable boxes)

A. CHECK BOX(ES) IF ENVIRONMENTAL DOCUMENT WAS OR WILL BE PREPARED FOR THIS PROJECT AND PROVIDE THE STATE CLEARINGHOUSE NUMBER (SCH#):

- ENVIRONMENTAL IMPACT REPORT (EIR) SCH# _____
- NEGATIVE DECLARATION (ND)/MITIGATED NEGATIVE DECLARATION (MND) SCH# _____
- ADDENDUM TO (Identify environmental document) _____ SCH# _____

B. IF ENVIRONMENTAL DOCUMENT(S) WAS NOT PREPARED, PLEASE PROVIDE THE FOLLOWING INFORMATION:

There are no changes proposed and therefore no "project" under CEQA; therefore, no additional environmental document was prepared for the JTD amendment

- CATEGORICAL/STATUTORY EXEMPTION (CESE)
EXEMPTION TYPE _____ GUIDELINE # _____

Part 6. LIST OF ATTACHMENTS (Fill in the date for each document checked)

A. REQUIRED WITH ALL APPLICATION SUBMITALS:

- | | |
|---|---|
| <input checked="" type="checkbox"/> RFI/JTD October 2008 | <input type="checkbox"/> ENVIRONMENTAL DOCUMENT(S): |
| <input checked="" type="checkbox"/> LOCAL USE/PLANNING PERMITS May 1998 (See Appendix C of JTD) | <input type="checkbox"/> EIR _____ |
| <input checked="" type="checkbox"/> LOCATION MAP September 2008 (see Figure 1 of JTD) | <input type="checkbox"/> MND/ND _____ |
| <input checked="" type="checkbox"/> MITIGATION MONITORING IMPLEMENTATION SCHEDULE May 1998
(see Appendix C of JTD) | <input type="checkbox"/> EXEMPTION _____ |
| | <input type="checkbox"/> ADDENDUM _____ |

B. ADDITIONAL REQUIRED DOCUMENTS FOR LANDFILLS ONLY:

- | | |
|--|---|
| <input checked="" type="checkbox"/> OPERATING LIABILITY FINANCIAL MECHANISM (Letter from CIWMB)
Dated April 2008 | <input checked="" type="checkbox"/> FINANCIAL RESPONSIBILITY DOCUMENTATION |
| <input checked="" type="checkbox"/> CLOSURE/POST CLOSURE MAINTENANCE PLAN
<input checked="" type="checkbox"/> PRELIMINARY October 2008 <input type="checkbox"/> FINAL | <input checked="" type="checkbox"/> LANDFILL CAPACITY SURVEY RESULTS (see Instructions) November 2005 |

C. IF APPLICABLE:

- | | |
|---|--|
| <input type="checkbox"/> REPORT OF WASTE DISCHARGE _____ | <input type="checkbox"/> DEPT. OF HEALTH SERVICES PERMIT _____ |
| <input type="checkbox"/> CONTRACT AGREEMENTS _____ | <input type="checkbox"/> SWAT (Air and water) _____ |
| <input type="checkbox"/> STORMWATER PERMIT APPLICATION _____ | <input type="checkbox"/> WETLANDS PERMITS _____ |
| <input type="checkbox"/> NPDES PERMIT APPLICATION _____ | <input type="checkbox"/> OTHER _____ |
| <input type="checkbox"/> VERIFICATION OF FIRE DISTRICT COMPLIANCE _____ | |

Part 7. OWNER INFORMATION (For disposal site, if operator is different from land owner, attach lease or other agreement)

TYPE OF BUSINESS:

- SOLE PROPRIETORSHIP PARTNERSHIP CORPORATION GOVERNMENT AGENCY

OWNER(S) OF LAND

(Name): Waste Management of CA Inc.

SSN OR TAX ID #

85-1735737

ADDRESS, CITY, STATE, ZIP 800 E. Avenue F Lancaster, CA 93535

TELEPHONE #: 661 726-3488

FAX #:

661-945-9797

E-MAIL ADDRESS: jmeritt1@wm.com

CONTACT PERSON (Print Name): Jim Meritt

Part 8. OPERATOR INFORMATION (For disposal site, if operator is different from land owner, attach lease or other agreement)

TYPE OF BUSINESS:

SOLE PROPRIETORSHIP

PARTNERSHIP

CORPORATION

GOVERNMENT AGENCY

FACILITY OPERATOR(S) Same as Owner
(Name):

SSN OR TAX ID #:

ADDRESS, CITY, STATE, ZIP

TELEPHONE #:

FAX #:

E-MAIL ADDRESS:

CONTACT PERSON (Print Name):

ADDRESS WHERE LEGAL NOTICE MAY BE SERVED: CT Corp. 818 W 7th St. 2nd floor, Los Angeles, CA 90017

Part 9. SIGNATURE BLOCK

Owner:

I certify under penalty of perjury that the information I provided for this application and for any attachments is true and accurate to the best of my knowledge and belief. I am aware that the operator intends to operate a solid waste facility at the site specified above pursuant to this application and understand that I may be responsible for the site should the operator fail to meet applicable requirements.

SIGNATURE (LAND OWNER OR AGENT):

Jim Merritt
PRINTED NAME: Jim Merritt

2-12-07

TITLE: District Manager

DATE:

Operator:

I certify under penalty of perjury that the information contained in this application and all attachments are true and accurate to the best of my knowledge and belief.

SIGNATURE (FACILITY OPERATOR OR AGENT):

Jim Merritt
PRINTED NAME:

2-12-07

Jim Merritt

TITLE: District Manager

DATE:

Part 10. OTHER (Attach additional sheets to explain any responses that need clarification).



Shipment Receipt

(Keep this for your records.)

Transaction Date 12 Feb 2007

Address Information

Ship To:
DEPARTMENT OF HEALTH SERVICES
MARK COMO
5050 COMMERCE DR
BALDWIN PARK CA 91706-1423

Shipper:
WASTE MANAGEMENT
NICOLE STETSON
6612233418
1200 W CITY RANCH RD
PALMDALE CA 93551

Ship From:
WASTE MANAGEMENT
NICOLE STETSON
6612233418
1200 W CITY RANCH RD
PALMDALE CA 93551

Shipment Information

Service: UPS Next Day Air
***Guaranteed By:** 10:30 AM, Tues. 13 Feb. 2007

Shipping: **15.25

Package Information

Package 1 of 1
Tracking Number: 1Z8A3R800190474033
Package Type: UPS Letter
Actual Weight: Letter
Billable Weight: Letter
Reference#1: AVRDF LF II GW ADC & SOIL

Billing Information

Bill Shipping Charges to: Credit Card Visa xxxxxxxxxxxx4299

Total: All Shipping Charges in USD **15.25

Note: Your invoice may vary from the displayed reference rates.

* For delivery and guarantee information, see the UPS Service Guide. To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.

** Rate includes a fuel surcharge.

Responsibility for Loss or Damage

Unless a greater value is recorded in the declared value field as appropriate for the UPS shipping system used, the shipper agrees that the released value of each package covered by this receipt is no greater than \$100, which is a reasonable value under the circumstances surrounding the transportation. If additional protection is desired, a shipper may increase UPS's limit of liability by declaring a higher value and paying an additional charge. UPS does not accept for transportation and shipper's requesting service through the Internet are prohibited from shipping packages with a value of more than \$50,000. The maximum liability per package assumed by UPS shall not exceed \$50,000, regardless of value in excess of the maximum. Claims not made within nine months after delivery of the package (sixty days for international shipments), or in the case of failure to make delivery, nine months after a reasonable time for delivery has elapsed (sixty days for international shipments), shall be deemed waived. The entry of a C.O.D. amount is not a declaration of value for carriage purposes. All checks or other negotiable instruments tendered in payment of C.O.D. will be accepted by UPS at shipper's risk. UPS shall not be liable for any special, incidental, or consequential damages. All shipments are subject to the terms and conditions contained in the UPS Tariff and the UPS Terms and Conditions of Service, which can be found at www.ups.com.



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Director and Health Officer

JOHN F. SCHUNHOFF, Ph.D.
Acting Chief Deputy

Environmental Health
TERRANCE POWELL, R.E.H.S.
Acting Director of Environmental Health

ALFONSO MEDINA, R.E.H.S.
Director of Environmental Protection Bureau

Solid Waste Management Program/L.A. County LEA
Ken Murray, Chief R.E.H.S.
5050 Commerce Drive
Baldwin Park, CA 91706
TEL (626) 430-5540 FAX (626) 813-4839

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March 16, 2007

Jim Merritt
District Landfill Manager
Waste Management - LLRC
600 East Avenue F
Lancaster, CA 93535

Dear Mr. Merritt:

**RE: SUBMITTAL OF APPLICATION FOR JTD AMENDMENT FOR
LANCASTER LANDFILL AND RECYCLING CENTER (LLRC) - SWIS #19-
AA-0050**

Thank you for responding to our request to submit a JTD amendment application, for LLRC, covering administrative changes, updates, minor edits, figures, drawings and tables. The Preliminary Closure/Post Closure Maintenance Plan (PCPCMP) was also included with updates to reflect applicable changes made in the JTD. The updates made to the JTD and PCPCMP involve no changes to the design and operation of the facility and now reflect the current conditions of the facility.

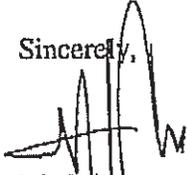
After review of the application package, a determination was made to accept the JTD amendment on March 16, 2007. The amendment meets the requirements of Title 27 CCR, section 21665: the proposed change is consistent with all applicable certified and/or adopted CEQA documents, or has been determined to not create any adverse environmental impacts and is exempt from the requirements of CEQA. The amendment is acceptable and consistent with, but not limited to, state minimum standards pursuant to Chapter 3 of this subdivision or applicable minimum standards in Title 14 (commencing with § 17200), and including financial assurances and operating liability criteria pursuant to Chapter 6 of this subdivision if applicable; and the changes do not conflict with the terms and conditions in the current Solid Waste Facility Permit.

12-0033

Jim Merritt
March 16, 2007
Page 2

The copies of the amended text pages in revision mode were very helpful and greatly appreciated.
If you have any questions, please contact me by phone at (626) 430-5540 or by email at
mcomo@ph.lacounty.gov

Sincerely,



Mark Como
EHS III



JONATHAN E. FIELDING, M.D., M.P.H.
Acting Director and Health Officer

JOHN F. SCHUNHOFF, Ph.D.
Acting Chief Deputy

Environmental Health
ARTURO AGUIRRE, R.E.H.S., M.A.
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FAX COVER SHEET

DATE: 4/2/07

TO: JIM MERRITT

SUBJECT: JTD memo for WEC

FAX #: _____ PHONE # _____

OF PAGES: 3

COMMENTS:

FROM THE DESK OF: MURRAY PHONE # 430-5540

OUR FAX NUMBERS: (626) 813-4839 OR (626) 813-3022
818 902-4458

ENCLOSURE 3



California Regional Water Quality Control Board
Lahontan Region



Linda S. Adams
Secretary for
Environmental Protection

Victorville Office
14440 Civic Drive, Suite 200, Victorville, California 92392
(760) 241-6583 • Fax (760) 241-7308
<http://www.waterboards.ca.gov/lahontan>

Arnold Schwarzenegger
Governor

September 9, 2010

WDID No. 6B190343001

Nicole Stetson, District Landfill Manager
Waste Management, Inc.
600 East Avenue F
Lancaster, CA 93535
Fax (805) 945-2269

RESPONSE TO COMMENTS ON TENTATIVE AMENDED WASTE DISCHARGE REQUIREMENTS FOR LANCASTER LANDFILL AND RECYCLING CENTER AND GROUNDWATER TREATMENT DISCHARGE, LOS ANGELES COUNTY

California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received comments from Waste Management, Inc. (WMI) on the tentative Amended Waste Discharge Requirements (WDRs) for the Lancaster Landfill and Recycling Center (LLRC) on August 17, 2010. The LLRC WDRs are being amended to incorporate an engineered alternative final cover (evapotranspirative soil cover) as proposed in the revised Preliminary Closure and Post Closure Maintenance Plan (PCPCMP). Your comments are summarized below, each followed by our response (WB response). A copy of the email containing WMI comments is enclosed for completeness.

WMI Comment 1: WDR, Page 1 #2 – As you are aware, we are not currently utilizing the groundwater treatment system at Lancaster. Since the "Treatment System" is not referred to elsewhere in this document, does not reflect current conditions, and has no bearing on the alternative cap approval, I believe the portion related to the treatment system should be removed.

Response 1: Thank you for your comment. On May 14, 1992, the Water Board amended WDRs for the LLRC under Board Order No. 6-92-70A1 to require corrective action to remediate the known release and set a time schedule to implement the proposed groundwater pump and treat system (Treatment System). Concurrently with the WDR amendment on May 14, 1992, the Water Board also adopted WDRs under Board Order No. 6-92-20 to regulate the discharge of treated effluent from the Treatment System at the LLRC. Subsequently, the Water Board adopted Revised WDRs under Board Order No. 6-95-103 on September 14, 1995, to implement Subtitle D regulations and to establish the Corrective Action Program (CAP) for the facility (the Treatment System).

California Environmental Protection Agency



Recycled Paper

12-0037

The Treatment System is identified in the existing WDRs as part of the LLRC facility. It is essential to maintain consistency with the existing WDRs and identify the Treatment System in the WDR amendment.

Groundwater beneath the landfill has been impacted with volatile organic compounds (VOC), and landfill gas migration has been shown to be the source of that release. The Treatment System is the currently approved CAP to remediate the VOC impacted groundwater beneath the landfill. Proposed finding no. 36.c establishes the benefits of the proposed engineered alternative with respect to landfill gas migration and post-closure landfill gas management. Compared to the prescriptive standard, the proposed evapotranspirative cover will provide superior protection against water quality impairment from landfill gas migration at the LLRC. Therefore we feel that is important to establish a relationship between the known release, the CAP, and the proposed engineered alternative final cover in the WDR amendment.

WMI Comment 2: WDRs, Page 2 #1 Finding 36 – This finding refers only to the April 1999 PCPCMP. As part of the 5-year solid waste facility permit review, this document was updated and submitted to the LEA and RWQCB November 20, 2006 with some additional minor changes submitted February 12, 2007. Attached are documents related to the 5 year review and the following is a summary of what occurred:

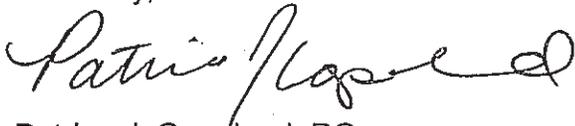
- *William Marciniak conducted the 18-month State inspection of the Lancaster Landfill on 6/2/06 (inspection report is attached and provides a good summary as well). Marciniak noted on the report that our original 5 year review submittal of 4/5/05 needed to be updated to include training and procedures for handling untreated medical waste at the site. His report also noted that the groundwater monitoring sections were no longer accurate. A revised permit review application was subsequently submitted however, WM received further direction to complete a thorough review and update of the JTD and PCPCMP's. These revised documents were submitted on 11/20/06 and 2/12/07. The revisions included updates to capacity and site life calculations, operational changes, updated cost estimates along with significant changes to the groundwater monitoring system since the extraction system shut down and CAP Pilot Study Report and subsequent update were submitted to RWQCB. We received approval of the documents from the LEA however have not received anything from your office. This finding should be updated to reflect the subsequent PCPCMP revision.*

Response 2: Thank you for your comment. We have updated proposed Finding 36 to reflect the subsequent 2006/2007 revision.



If you have any questions regarding this letter, please contact me at (760) 241-7404 (pcopeland@waterboards.ca.gov) or Jan Zimmerman, Engineering Geologist, at (760) 241-7376 (jzimmerman@waterboards.ca.gov).

Sincerely,



Patrice J. Copeland, PG
Land Disposal Chief

Enc: Email from Nicole Stetson, WMI, dated August 17, 2010

cc: Laura Keener, Waste Management, LLRC
Jim Merrit, Site Manager, Waste Management, LLRC
Yonas Zemuy, Geosyntec Consultants
Jeffrey Dobrowolski, Geosyntec Consultants
Rosevelt Davis, Los Angeles County
Dianne Ohiosumua, CalRecycle

S:\Board Orders 2010\LANCASTER LF\TENTATIVE\comments\Resp_WMIcomments_TENT.doc



Jan Zimmerman - RE: AMENDED WASTE DISCHARGE REQUIREMENTS FOR LANCASTER LANDFILL

From: "Stetson, Nicole" <NStetson@wm.com>
To: "Jan Zimmerman" <JZimmerman@waterboards.ca.gov>
Date: 8/17/2010 4:29 PM
Subject: RE: AMENDED WASTE DISCHARGE REQUIREMENTS FOR LANCASTER LANDFILL
CC: "Keener, Laura" <LKeener@wm.com>, <YZemuy@Geosyntec.com>, <JDobrowolski@Geosyntec.com>
Attachments: LLRC Public Hearing Notice Untreated Med Waste 5-17-06.pdf; LEA Response Letter 3-16-07.pdf; BAS Rev Ltr 2-12-07.pdf; BAS Submittal Ltr 5 Yr Review 11-20-06.pdf; LLRC CIWMB 18 Mo. Inspection Report 6-2-06.PDF

Jan,

Per our conversation on Friday, I have a couple of comments to the draft amended WDR for Lancaster:

- Page 1 #2
 - o As you are aware, we are not currently utilizing the groundwater treatment system at Lancaster. Since the "Treatment System" is not referred to elsewhere in this document, does not reflect current conditions, and has no bearing on the alternative cap approval, I believe the portion related to the treatment system should be removed.

- Page 2 #1 Finding 36
 - o This finding refers only to the April 1999 PCPCMP. As part of the 5-year solid waste facility permit review, this document was updated and submitted to the LEA and RWQCB November 20, 2006 with some additional minor changes submitted February 12, 2007. Attached are documents related to the 5 year review and the following is a summary of what occurred:
 - William Marciniak conducted the 18-month State inspection of the Lancaster Landfill on 6/2/06 (inspection report is attached and provides a good summary as well). Marciniak noted on the report that our original 5 year review submittal of 4/5/05 needed to be updated to include training and procedures for handling untreated medical waste at the site. His report also noted that the groundwater monitoring sections were no longer accurate. A revised permit review application was subsequently submitted however, WM received further direction to complete a thorough review and update of the JTD and PCPCMP's. These revised documents were submitted on 11/20/06 and 2/12/07. The revisions included updates to capacity and site life calculations, operational changes, updated cost estimates along with significant changes to the groundwater monitoring system since the extraction system shut down and CAP Pilot Study Report and subsequent update were submitted to RWQCB.

12-0040

We received approval of the documents from the LEA however have not received anything from your office. This finding should be updated to reflect the subsequent PCPCMP revision.

These will be the only two comments to the draft WDR – Laura Keener and Geosyntec do not have any additional comments.

Please contact me with any questions.

Thanks,
Nicole

From: Rebecca Phillips [mailto:rphillip@waterboards.ca.gov]
Sent: Wednesday, August 04, 2010 2:40 PM
To: Ed Wosika; Leslie Graves; Nadine Langley; Keener, Laura; Stetson, Nicole
Cc: Jan Zimmerman
Subject: AMENDED WASTE DISCHARGE REQUIREMENTS FOR LANCASTER LANDFILL

Attached is the Tentative Lancaster Landfill & Recycling Center amended order which is scheduled for the Oct Board Meeting for your review.

If you should have any questions or comments, please contact Jan Zimmerman at 760 241-7376

Thank you

Rebecca

Rebecca Phillips, Office Technician
(760) 241-7306 - fax: (760) 241-7308
rphillip@waterboards.ca.gov

Waste Management recycles enough paper every year to save 41 million trees. Please recycle any printed emails.

12-0041