

Los Angeles Regional Water Quality Control Board

October 20, 2014

Gary Tse, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
1000 South Fremont Avenue, Unit 47
Alhambra, California 91803

**RESPONSE TO COMMENTS - TENTATIVE WASTE DISCHARGE REQUIREMENTS –
PETER PITCHESS LANDFILL, SAUGUS, CALIFORNIA (FILE NO. 75-014, ORDER NO. 01-
133, CI-6198, GEOTRACKER GLOBAL ID. L10005092201)**

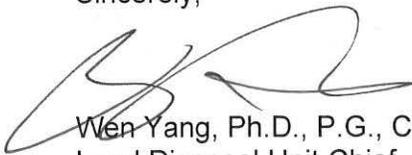
Dear Mr. Tse:

Reference is made to a letter from this Regional Water Quality Control Board (Regional Board), dated September 15, 2014, transmitting tentative Waste Discharge Requirements (WDRs) for the Peter Pitchess Landfill Center municipal solid waste landfill (Landfill) in Saugus, California (tentative Order). The deadline for submitting comments on the tentative Order was October 17, 2014. Comments were received from CalRecycle and the County of Los Angeles Sheriff's Department (Sheriff's Department) by the deadline on the tentative Order. Regional Board staff has considered all comments submitted, made appropriate revisions to the tentative Order accordingly, and prepared the attached Response to Comments. A redline version that includes all revisions to the tentative Order released on September 15, 2014, as well as copies of all comments received, are also attached to this letter.

Written comments regarding the tentative Order were required by the Regional Board by 5:00PM on October 17, 2014, in order to be evaluated by Regional Board staff, be included in the Regional Board's agenda folder, and allow Regional Board members sufficient time to give full consideration to the comments and issues raised. Following review of the revisions to the tentative Order, the Sheriff's Department can raise any additional questions or comments as testimony before the Board during the public meeting on November 7, 2014.

Should you have any questions, please contact Dr. Enrique Casas, Project Manager, at (213) 620-2299 or me at (213) 620-2253.

Sincerely,



Wen Yang, Ph.D., P.G., C.E.G.
Land Disposal Unit Chief

Attachments

- 1) Comments received,
- 2) Responses to comments received
- 3) Revised tentative WDRs in redline format

cc: Ms. Leslie Graves, State Water Resources Control Board
Ms. Shannon Hill, CalRecycle
Mr. Pete Oda, County of Los Angeles Department of Public Health, Solid Waste
Mr. Reed Sato, Department of Toxic Substance Control
Mr. Ed Pert, Department of Fish and Wildlife
Mr. Mark Stuart, Chief, Department of Water Resources, Southern District
Mr. Patrick Hotra, South Coast Air Quality Management District
Mr. Mauricio E. Guardado, Castaic Lake Water Agency Santa Clarita Water Division
Mr. Keith Abercrombie, Valencia Water Company

Casas, Enrique@Waterboards

From: Wochnick, Michael@CalRecycle <Michael.Wochnick@CalRecycle.ca.gov>
Sent: Tuesday, September 16, 2014 2:30 PM
To: Yang, Wen@Waterboards; Casas, Enrique@Waterboards
Cc: Jan, Peter@CalRecycle
Subject: FW: Peter Pitchess Landfill_Tent WDR, CI 6198_2014-09-15
Attachments: Peter Pitchess Landfill_Tent WDR, CI 6198_2014-09-15.pdf

Wen & Enrique –

Peter and I have reviewed the tentative WDRs for Peter Pitchess. The only comment we have is that there is no enforceable timeline in the WDRs. There is no required start date nor completion date. Since this landfill has not been in operation for over 20 years and should have closed several years ago, dates for both initiating and completing closure activities would appear to be appropriate. Therefore, CalRecycle requests that dates for beginning and ending closure activities be included in the WDRs. Our suggestion is that closure should commence no later than the beginning of the next construction season. The date for conclusion of closure activities should coincide with the implementation schedule in the approved closure plan.

Thank you for your consideration. Any questions, let Peter or I know.

Michael Wochnick, P.E.
CalRecycle
Closure and Technical Support
916-341-6289
916-319-7334 (fax)



John L. Scott, Sheriff

County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



October 17, 2014

Mr. Enrique Casas
Land Disposal Unit
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

Dear Mr. Casas:

**PITCHESS DETENTION CENTER – CLASS III LANDFILL
TENTATIVE WASTE DISCHARGE REQUIREMENTS (FILE NUMBER 75-014)
LOS ANGELES COUNTY SHERIFF'S DEPARTMENT COMMENTS**

The County of Los Angeles Sheriff's Department (Department) has reviewed the attached Tentative Waste Discharge Requirements (Tentative Order) for the Peter Pitchess Landfill (File Number 75-014, Order Number 01-133, CI-6198) and provides the following comments regarding the Tentative Order:

- Under the section entitled Background, the fourth sentence in the second paragraph should be corrected to read, "Two other small disposal sites (referred to as the "abandoned landfills") occur on the Honor Rancho and are located *southwest* of the Class III landfill."

The following concern Monitoring and Reporting Program No. CI-6198:

- Monitoring Program section, Paragraph 11 (Five-Year COCs), on page T-2 – the Department is currently performing the Five-Year COCs Scan. Per the existing Monitoring and Reporting Program, the next event is scheduled for September 2016, not September 2015, as indicated in the draft. The Department requests that the current schedule be maintained, with the initial Five-Year COCs Scan under the proposed Monitoring and Reporting Program occurring in September 2016.
- Monitoring Program section, Paragraph 15, sub-paragraph a.i. (Scope List), on page T-5 – we request the period for creating and submitting the required

A Tradition of Service Since 1850

Scope List be extended to within 120 days of the effective date of the Order, rather than within 90 days as presently indicated.

- Sampling and Analytic Procedures section, paragraph 18, sub-paragraph f, on page T-8 – we request the period for submitting the technical report be extended to within 120 days of the adoption of the Order, rather than within 90 days as presently indicated.
- Reports to be filed with the Regional Board section, paragraph 31, sub-paragraph d, on page T-11 – the stated requirements reference “section D.16 of the Order.” The Tentative Order does not contain a section D.16. Please correct this reference.

The Department recognizes that comments from other agencies and/or interested parties might result in additional revisions to the Tentative Order. Therefore, prior to the November 6, 2014, public hearing before the Regional Board, we ask that the Department be afforded another opportunity to review and provide comments on any further revisions to the Tentative Order.

Should you have any questions or require additional information, please contact Tom Bellizia, of my staff, at (626) 300-3021.

Sincerely,

JOHN L. SCOTT, SHERIFF

A handwritten signature in cursive script that reads "David Calvan FOR".

Gary T. K. Tse, Director
Facilities Planning Bureau

Response to Comments

Item 6

Commenter (Date submitted)	Summary of Comments	Response / Action
<p>California Department of Resources Recycling and Recovery (9/16/2014)</p>	<p>Since this landfill has not been in operation for over 20 years and should have closed several years ago, dates for both initiating and completing closure activities would appear to be appropriate. Therefore, CalRecycle requests that dates for beginning and ending closure activities be included in the WDRs. Our suggestion is that closure should commence no later than the beginning of the next construction season. The date for conclusion of closure activities should coincide with the implementation schedule in the approved closure plan.</p>	<p>Staff concurs that an enforceable date for completion of final closure is warranted. Pursuant to the approved closure plan, the closure construction process will require completion of the final construction bid documents and obtaining a qualified contractor. Final closure construction is estimated to take fourteen weeks to complete after the contractor is issued a Notice to Proceed. Accordingly, the tentative WDRs have been revised to include provision C.2 which states: “Unless otherwise approved by the Executive Officer, the Discharger shall complete all final closure construction activities at the Landfill no later than October 1, 2015. Within 120 days after completing the construction of the final cover system, the Discharger shall submit a final construction quality assurance (CQA) report that meets the requirements of section 20324 of 27 CCR to the Regional Board.” The October 1, 2015 construction completion date allows for ample time to complete the construction bid documents and hire a contractor (approximately 32 weeks) and complete construction (approximately 14 weeks) prior to the 2015 winter season.</p>
<p>County of Los Angeles Sheriff's Department (10/17/2014)</p>	<p>Under the section entitled Background, the fourth sentence in the second paragraph should be corrected to read, “Two other small disposal sites (referred to as the “abandoned landfills”) occur on the Honor Rancho and are located <i>southwest</i> of the Class III landfill”</p>	<p>The correction has been made.</p>
	<p>Monitoring Program section, Paragraph 11 (Five-Year COCs), on page T-2 – The Department is currently performing the Five-Year COCs Scan. Per the existing Monitoring and Reporting Program, the next event is scheduled for September 2016, not September 2015, as indicated in the draft. The Department requests that the current schedule be maintained, with the initial Five-Year COCs Scan under the proposed Monitoring and Reporting Program occurring in September 2016.</p>	<p>Regional Board staff concurs that the existing schedule for conducting Five-Year COCs scans should be maintained. The Tentative Order has been revised accordingly.</p>
	<p>Monitoring Program section, Paragraph 15, subparagraph a.i. (Scope List), on page T-5 – we request the period for creating and submitting the required Scope List be extended to with 120 days of the effective date of the Order rather than within 90 days as presently indicated.</p>	<p>Regional Board staff believes that 90 days to prepare the required scope list is adequate, and is consistent with the WDRs for comparable landfills within the Region. The Tentative Order has not been revised accordingly.</p>

Response to Comments

Item 6

Committer (Date submitted)	Summary of Comments	Response / Action
<p>County of Los Angeles Sheriff's Department (10/17/2014)</p>	<p>Sampling and Analytic Procedures section, paragraph 18, sub-paragraph f, on page T-8 – we request the period for submitting the required technical report be extended to with 120 days of the effective date of the Order rather than within 90 days as presently indicated.</p>	<p>Regional Board staff believes that 90 days to prepare the required technical report is adequate, and is consistent with the WDRs for comparable landfills within the Region. The Tentative Order has not been revised accordingly.</p>
	<p>Reports to be filed with the Regional Board section, paragraph 31, sub-paragraph d, on page T-11 – the stated requirements reference “section D.16 of the Order.” The Tentative Order does not contain a section D.16. Please correct the reference</p>	<p>The correct reference is C.13. The Tentative Order has been revised accordingly.</p>
	<p>The Department recognizes that comments from other agencies and/or interested parties might result in additional revisions to the Tentative Order. Therefore, prior to the November 6, 2014, public hearing before the Regional Board, we ask that the Department be afforded another opportunity to review and provide comments on any further revisions to the Tentative Order.</p>	<p>The comment period for the tentative Order is closed. However, following review of the revisions to the tentative Order, the Sheriff's Department can raise any additional questions or comments as testimony before the Board during the public meeting on November 7, 2014</p>

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

ORDER NO. R4- 2014-XXXX

REVISED WASTE DISCHARGE REQUIREMENTS
FOR
CLOSURE AND POSTCLOSURE MAINTENANCE
AND CORECTIVE ACTION PROGRAM

COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT
(PETER PITCHESS LANDFILL)
(FILE NO. 75-014)

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

BACKGROUND

1. The Peter Pitchess Landfill (Landfill), located at 29300 the Old Road, Saugus, CA (Figure 1), is an inactive Class III municipal solid waste (MSW) landfill located on the Peter J. Pitchess Honor Rancho (Honor Rancho), a detention facility owned and operated by the County of Los Angeles Sheriff's Department (Discharger).
2. The Landfill was in operation from 1958 until October 1993. The Honor Rancho property is approximately 2,800 acres in size (Figure 2). The Landfill occupies approximately 15 acres. Two other small disposal sites (referred to as the "abandoned landfills") occur on the Honor Rancho and are located southeast-southwest of the Class III landfill. The abandoned landfills were separately investigated by the County of Los Angeles Fire Department, Health Hazardous Material Division under the jurisdiction of the Regional Board and are not subject to these WDRs.
3. In 1975, the MSW Landfill and an inert waste disposal site, became subject to waste discharge requirements (WDRs) under Regional Board Order No. 75-114, adopted October 20, 1975. Historic groundwater monitoring at the Honor Rancho indicated that the inert waste disposal site was not a threat to groundwater quality, thus is not subject to these WDRs.
4. On September 27, 1993, Order 75-114 was amended when the Regional Board adopted Order No. 93-062 incorporating federal Resource Conservation and Recovery Act (Subtitle-D) regulations for MSW landfills.
5. On September 19, 2001, the Regional Board adopted Order No. 01-133 to update groundwater monitoring requirements for the Landfill. Regional Board Order No. 01-133 rescinded Order No. 75-114.
6. The Landfill is currently regulated by WDRs under Regional Board Order Nos. 01-133 and 93-062. These WDRs are being updated to incorporate applicable closure and post-closure requirements of title 27 of the California Code of Regulations (27 CCR) and Subtitle-D.

T
E
N
T
A
T
I
V
E

ENVIRONMENTAL SETTING

7. The Honor Rancho is composed of two topographically distinct areas; the relatively flat, alluviated area of Castaic Valley adjacent to Castaic Creek, and hilly terrain located east of Castaic Valley (Figure 3).
8. Landfilling was conducted in an unnamed tributary canyon of Dairy Valley that, in turn, is tributary to Castaic Valley.
9. The Landfill was operated as a modified "cut and cover" landfill and later a cut and cover canyon bale-fill. Landfill wastes consisted primarily of household-type refuse from the operation of the detention facility and small amounts of wastes from farming activities.
10. The Honor Rancho is situated within the San Gabriel Mountains, and is traversed by the San Gabriel Fault Zone, a major structural feature in the region (Figure 3). The Landfill is on the up-thrown side of the fault and is located on bedrock of the Saugus Formation. The area immediately west of the Landfill lies down-dip of the fault in alluvial material.
11. Mapped splays of the active San Gabriel Fault Zone flank both the north and south sides of the Landfill. The closest known active strand of the San Gabriel Fault occurs approximately one mile to the southeast of the Landfill. The active Holser and Oak Ridge faults are located three and nine miles southwest of the Landfill, respectively. The San Cayetano Fault is exposed roughly five miles west of the Landfill. The Clearwater Fault is located about 10 miles northeast of the Landfill. The Santa Susana thrust fault underlies much of the Santa Susanna Mountains to the south of the Landfill but is exposed roughly 15 miles south of the site. The nearest approach of the active San Andreas Fault is about 16 miles to the northeast of the site.
12. Bedrock of the Saugus Formation consists of moderately indurated, thinly stratified conglomeratic sandstone beds ranging from 0.6 to 3.0 meters (2 to 10 feet) in thickness.
13. The Honor Rancho property is located within the Eastern Hydrologic Subarea of the Upper Santa Clara River Hydrologic Subunit in the Santa Clara-Calleguas Hydrologic Unit.
14. The Landfill is located within the Santa Clara River Valley Groundwater Basin, East Subbasin, which is comprised of two aquifer systems. The alluvial aquifer system generally underlies the Santa Clara River and its several tributaries, and the Saugus Formation Aquifer underlies bedrock areas of upper Santa Clara River (Figure 2).
15. The Landfill overlies the Saugus Formation Aquifer. Groundwater of the Saugus Aquifer generally contains elevated concentrations of total dissolved solids (TDS), calcium and sulfate. The calcium and sulfate originate from the gypsum-bearing sedimentary rocks in the area. The Dairy Valley Aquifer (Figure 3) lies immediately west of the Saugus Aquifer and is downgradient of the Landfill. The Castaic Valley Alluvial Aquifer is downgradient of the Saugus Aquifer and Dairy Valley Aquifer. Groundwater of the Dairy Valley Aquifer and Castaic Valley Alluvial Aquifer also generally contains elevated concentrations of TDS, calcium and sulfate.
16. The Regional Board adopted a revised Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) on June 13, 1994, identifies

T
E
N
T
A
T
I
V
E

beneficial uses for groundwater in the Saugus Aquifer as municipal and domestic supply (MUN). Beneficial uses for groundwater in the Castaic Valley Aquifer are MUN, industrial service supply (IND), industrial process supply (PROC), and agricultural Supply (AGR). The requirements in this Order, as they are met, will be in conformance with the goals of the Basin Plan.

17. The Landfill is located in a property designated as public and semi-public facilities (Los Angeles County General Plan, Figure 4). The nearest buildings are the high security detention center facilities located approximately 200 feet to the north of the Landfill. No other structures are within 1,000 feet of the Landfill. The adjacent land within one mile of the Landfill is designated as heavy agricultural, public facilities, and open space.
18. The majority of the Landfill consists of a relatively flat deck area comprising the eastern three-fourths of the site which is separated from a much smaller deck area on the west by an approximately 50-foot high 2.5:1 (horizontal to vertical) slope. The natural ridges adjacent to the Landfill are approximately 100 feet above the existing surface of the Landfill (Figure 5).
19. The Landfill is located outside a 100-year flood plain according to the Federal Emergency Management Agency Flood Insurance Rate Map for Los Angeles County, California.
20. Climatic conditions at the Honor Rancho are semi-arid. Rainfall typically occurs between October and April with very little rainfall during the summer months. Average annual precipitation in the area is approximately 14 inches. Average annual evaporation in the area is approximately 80 inches.

ENVIRONMENTAL CONTROL SYSTEMS

21. Any proposed engineered containment features for closure and postclosure maintenance of the Landfill will be constructed to the prescriptive standards of 27 CCR and/or 40 CFR or equivalent performance standards. This Order specifies that final design and construction methods for proposed engineered systems be reviewed and approved by the Executive Officer prior to installation and use.
22. The Discharger proposes the post-closure end use of the Landfill to be non-irrigated open space.
23. The Landfill is not lined and does not have a leachate collection and removal system. Two earthen dams were constructed to contain disposal activities in the Landfill during landfilling operations.
24. The Landfill does not have a landfill gas control system. Vadose zone gas at the Landfill was monitored at the site until 1992 at six perimeter gas monitoring probes (Figure 5). As part of final closure, the Discharger will install a replacement perimeter gas monitoring network.
25. The Discharger submitted a Solid Waste Assessment Test (SWAT) report for the Landfill dated April 19, 1989. Four groundwater monitoring wells (one upgradient and three downgradient) were installed at the Landfill for the SWAT investigation. Because of the presence of volatile organic compounds (VOCs) in sidegradient wells (MW-6 / MW-6A) and locally elevated inorganic constituents such as TDS, chloride, and calcium in samples from

**T
E
N
T
A
T
I
V
E**

downgradient well MW-1, the SWAT concluded that the Landfill may have affected groundwater quality in the area.

26. During the Fall 2005 groundwater monitoring event at the Landfill, low levels of cis-1,2-dichloroethene (1.2 micrograms per liter) were detected in sidegradient groundwater monitoring well MW-3. In response to the detected release, the Discharger constructed an additional groundwater monitoring well (MW-7) and prepared an Engineering Feasibility Study (EFS). As part of the EFS, the Discharger completed aquifer pumping tests to evaluate aquifer characteristics, conducted intrinsic remediation modeling, identified available remedial alternatives, and screened the viable remedial alternatives based on cost and technical considerations. Intrinsic bioremediation (monitored natural attenuation) was selected as the appropriate Corrective Action Program (CAP) monitoring response to the documented release.
27. The existing Landfill groundwater monitoring system (Figure 5) includes six groundwater monitoring wells (MW-1, MW-2, MW-3, MW-6, MW-6A, and MW-7). Two monitoring wells (MW-4 and MW-5) were constructed as part of the investigation of the two abandoned landfills. Subsequently, they were converted to piezometers for the purpose of measuring groundwater elevation. Because of their distance from the Landfill and possible location on the west side of a splay of the San Gabriel Fault that may act as a groundwater barrier, groundwater monitoring will no longer be required at MW-4, MW-5, MW-6, and MW-6A under this Order.
28. A slope stability report is required pursuant to 27 CCR when final slopes are designed to be steeper than 3:1 (horizontal to vertical) for Class III landfills. Because the proposed final slopes for the Landfill are dominated by relatively flat deck area, a slope stability analysis for the Landfill has not been conducted by the Discharger.
29. The Discharger submitted a Final Closure/Post Closure Maintenance Plan (Plan) on April 25, 1997 for the Landfill. The Plan was conditionally approved by Regional Board staff on February 10, 1999. In a letter dated September 3, 1999, the California Integrated Waste Management Board (now the California Department of Resources Recycling and Recovery or CalRecycle) indicated that because closure and postclosure maintenance funding requirements (per 27 CCR) had not been satisfactorily addressed, the Plan could not be approved.
30. In 2003, the Discharger executed a financial resolution providing financial assurance that the Discharger could adequately fund closure and postclosure maintenance at the Landfill.
31. In January 2004, the Regional Board, CalRecycle, and their local enforcement agency (LEA), the Los Angeles County Department of Health Services, Solid Waste Program, approved the Plan with the understanding that the Discharger planned to evaluate an alternative final cover design to the prescriptive design included in the Plan.
32. On September 26, 2007, the Discharger submitted the report Final Closure Construction/Postclosure Maintenance Plan (amended closure plan). The amended closure plan proposed a four-foot thick compacted soil alternative design pursuant to requirements of 27 CCR section 20080.b and part 258.60 of the Code of Federal Regulations (40 CFR) and was approved by Regional Board staff on January 2, 2008. Final approval for the closure and postclosure maintenance plans was issued by CalRecycle on January 3, 2014.

**T
E
N
T
A
T
I
V
E**

33. In summary, the proposed final closure and postclosure maintenance of the Landfill includes the following:

I. CLOSURE

- a. Final cover – the Discharger proposes a water balance alternative final cover that consists of a monolithic soil cover with a minimum thickness of four feet. The depth of the vegetative layer will enable adequate root depth for development of on-site vegetation that will enhance evapotranspiration.
- b. The proposed final grading has been designed to blend with the natural topography of the surrounding area. The slope dividing the upper and lower decks will have a maximum gradient of 3:1 (horizontal to vertical). Deck areas will have a minimum grade of three percent to allow for future settlement while still maintaining adequate drainage control.
- c. Erosion of the final cover will be prevented by a minimum slope of approximately three percent in deck areas and the planting of native grasses to establish a vegetative cover that is visually compatible with the off-site native plant community, thus it will provide a similar appearance to the surrounding native open space vegetation.
- d. A settlement analysis completed by the Discharger indicates that, because of the age and character of the underlying waste, the majority of settlement has already taken place and Landfill settling will be negligible. Nevertheless, four settlement monuments are proposed to be placed on the Landfill in order to monitor future settlement at the site.
- e. The final surface area of the Landfill will be sloped to prevent ponding and promote lateral run-off of stormwater which falls directly on the Landfill. In addition, a perimeter drainage control system is proposed to divert stormwater run-on around the refuse fill area.
- h. The Discharger proposes a landfill gas control system for the corrective action response, if necessary, to mitigate a release of pollutants from the facility.
- i. A vadose zone gas network is proposed to be constructed and monitored pursuant to requirements of CalRecycle and the LEA.

II. POST-CLOSURE MAINTENANCE

- a. The Discharger will inspect the Landfill in accordance with the following frequencies:

	<u>Inspection Period</u>
1. Landfill gas migration monitoring and maintenance	Quarterly
2. Final cover inspection and maintenance	Quarterly
3. Access road inspection and maintenance	Quarterly
4. Drainage controls inspection and maintenance	Quarterly
5. Site security	Quarterly
6. Groundwater system monitoring and maintenance	Semiannual
7. Vegetative cover inspection and maintenance	Semiannual
8. Settlement monitoring and maintenance	5-Years

T
E
N
T
A
T
I
V
E

Appropriate measures will be taken to repair and correct any damage observed at the Landfill.

REGULATORY REQUIREMENTS

34. The United States Environmental Protection Agency (USEPA) under title 40 of the code of federal regulations (40 CFR) section 257 and section 258 (Subtitle D) revised existing regulations for municipal solid waste disposal facilities in response to the 1984 Hazardous and Solid Waste Amendments of the Resource Conservation and Recovery Act and added new detailed requirements. USEPA delegated the responsibility for implementing these regulations to states with a fully approved landfill regulatory program. As responsible agencies for an approved state, the State Water Resources Control Board (State Board) and the Regional Board adopted the federal Subtitle D regulatory requirements (State Board Resolution No. 93-62 and Regional Board Order No. 93-062, respectively) in 1993. Subtitle D requirements relevant to the Landfill include groundwater monitoring and corrective action, closure and postclosure maintenance, and financial assurance.
35. In accordance with Section 22220 of 27 CCR, the Discharger maintains assurance of financial responsibility for initiating and completing corrective action for all known or reasonably foreseeable releases from the Landfill (27 CCR 22220 et seq.). On August 14, 2014, the Discharger submitted a cost estimate of \$475,410 for financial assurance for all known or reasonably foreseeable water-related releases from the Landfill to the Regional Board. The corrective action cost estimate was approved by the Regional Board Executive Officer (Executive Officer) on September 15, 2014.

ADMINISTRATIVE

36. The State Board has adopted regulations that require the electronic submittal of information (ESI) for Groundwater Cleanup programs (section 3890 et seq. of title 23 of the California Code of Regulation [23CCR] and division 3 of 27 CCR). Starting in January 1, 2005, electronic submittal of these items and a portable data format (PDF) copy of full reports was extended to include all State Water Board groundwater cleanup programs, including the Land Disposal Program. The requirements contained in this Order, as they are met, conform to ESI reporting regulations.
37. California Water Code (CWC) section 13263 provides that all WDRs shall be reviewed periodically and, upon such review, may be revised by the Regional Board to comply with changing state or federal laws, regulations, policies, or guidelines. WDRs for the Landfill are being revised to include updated findings for closure and postclosure maintenance, as well as an updated water quality monitoring program.
38. Revision of the Discharger's WDRs for the Landfill constitutes an existing project as defined in section 15301, chapter 3, title 14 of the CCR and is therefore exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000 et seq.).
39. The Regional Board has notified interested agencies and all known interested parties of its intent to issue requirements for closure, postclosure maintenance for the Landfill. The Regional Board in a public meeting heard and considered all comments pertaining to closure, postclosure maintenance for the Landfill.

T
E
N
T
A
T
I
V
E

40. Any person aggrieved by this action of the Regional Board may petition the State Water Board to review the action in accordance with CWC section 13320 and 23CCR section 2050 and following. The State Water Board must receive the petition by 5:00 p.m., thirty days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

IT IS HEREBY ORDERED that the Discharger shall comply with the following requirements pertaining to the Landfill:

A. SPECIFICATIONS

1. Waste disposal activities at the Landfill have ceased. No MSW or any other wastes may be received at the Landfill for the purpose of disposal.
2. Inert soil, concrete, and asphalt materials that are used for the construction or repair of the final cover, access roads, or other facilities at the site may be imported to the site, provided that the source, volume, and usage of such imported materials are reported in the corresponding semi-annual report for the Landfill.
3. The Discharger shall remove any unacceptable wastes that arrive at the site in violation of the requirements in this Order to a facility legally permitted to accept the wastes.

B. PROHIBITIONS

1. The discharge of waste to land as a result of inadequate closure and postclosure maintenance practices, that have not been specifically described to the Regional Board, and for which valid WDRs are not in force, is prohibited.
2. Wastes received during operating life of the Landfill shall not:
 - a. Cause the occurrence of coliform or pathogenic organisms in waters pumped from a groundwater basin;
 - b. Cause the occurrence of objectionable tastes or odors in waters pumped from a groundwater basin;
 - c. Cause waters pumped from a groundwater basin to foam;
 - d. Cause the presence of toxic materials in waters pumped from a groundwater basin;
 - e. Cause the pH of waters pumped from a groundwater basin to fall below 6.0, or rise above 9.0;
 - f. Cause the Regional Board's water quality objectives for groundwater or surface water as established in the Basin Plan to be exceeded; and
 - g. Cause pollution, contamination, or nuisance, as defined in CWC section 13050, or

T
E
N
T
A
T
I
V
E

- adversely affect beneficial uses of groundwater or surface water as established in the Basin Plan.
3. Odors, vectors, and other nuisances of waste origin beyond the limits of the Landfill are prohibited.
 4. The discharge of waste to surface drainage courses or to usable groundwater is prohibited.
 5. The Discharger shall conduct closure and postclosure operations such that there is no release from the Landfill that causes any Basin Plan objective to be exceeded at any location under, or in the vicinity of, the Landfill. Moreover, no constituent of concern (COCs) shall exhibit a measurably significant increase over its respective concentration limit (background data set) at any well, as indicated by an approved statistical or non-statistical data analysis method (including that method's retesting approach).
 6. All applicable federal, state, and county sanitary health codes, rules, regulations, and ordinances pertinent to the disposal of wastes on land shall be complied with in the operation and maintenance of the Landfill.

C. REQUIREMENTS FOR CLOSURE AND POSTCLOSURE MAINTENANCE

1. Closure and postclosure maintenance of the Landfill shall be conducted in accordance with the Final Closure and Postclosure Maintenance Plan that was approved by CalRecycle on January 3, 2014.
- ~~1-2.~~ Unless otherwise approved by the Executive Officer, the Discharger shall complete all final closure construction activities at the Landfill no later than October 1, 2015. Within 120 days after completing the construction of the final cover system, the Discharger shall submit a final construction quality assurance (CQA) report that meets the requirements of section 20324 of 27 CCR to the Regional Board
- ~~2-3.~~ The Landfill post-closure maintenance period shall continue until the Regional Board determines that remaining wastes at the site will not threaten water quality.
- ~~3-4.~~ All containment structures and erosion and drainage control systems at the Landfill shall be designed and constructed under direct supervision of a California-registered civil engineer or certified engineering geologist, and shall be certified by the individual as meeting the prescriptive standards and/or performance goals of 27 CCR.
- ~~4-5.~~ The Discharger shall install containment structures that are capable of preventing degradation of the waters of the state. Construction standards for containment structures shall comply with 27 CCR requirements. Design specifications are subject to review and approval by the Executive Officer prior to any construction.
- ~~5-6.~~ The Discharger shall submit detailed preliminary plans, specifications, and descriptions for all proposed containment structures and construction features for Executive Officer approval at least 60 days prior to construction. The preliminary plans shall contain detailed quality assurance/quality control for the proposed construction. As-built plans shall be submitted within 60 days after the completion of construction. If the as-builts are virtually identical to the approved preliminary plans and specifications, only change

T
E
N
T
A
T
I
V
E

sheets need be submitted in lieu of complete as-built plans.

~~6-7.~~ Drainage controls, structures, and facilities shall be designed to divert any precipitation or tributary runoff and prevent ponding and percolation of water at the Landfill in compliance with section 20365 and section 21090(b)(1) of 27 CCR. When necessary, temporary structures shall be installed as needed to comply with this requirement.

~~7-8.~~ The Landfill shall be graded and maintained to promote runoff of precipitation and to prevent ponding of liquids and surface water. Erosion or washout of refuse or cover materials by surface flow shall be controlled to prevent off-site migration.

~~8-9.~~ The migration of gases from the Landfill shall be controlled as necessary to prevent water pollution, nuisance, or health hazards. The discharge of wastes or waste by-products (i.e., leachate or gas condensate) to off-site surface drainage courses or to groundwater is prohibited.

~~9-10.~~ During the closure and postclosure maintenance period, no wastewater shall leave the Landfill except as permitted by a National Pollutant Discharge Elimination System (NPDES) permit issued in accordance with the federal Clean Water Act and the California Code of Regulations.

~~10-11.~~ Gas condensate gathered from a gas monitoring and collection system at the Landfill shall not be returned to the Landfill unless approved by the Executive Officer. Any proposed gas monitoring and collection system shall be designed to allow the collection, testing and treatment, or disposal by approved methods, of all gas condensate produced at the Landfill.

~~11-12.~~ The Discharger shall develop/maintain permanent survey monuments at the Landfill throughout the development, closure and postclosure maintenance periods. Benchmarks shall be established and maintained in sufficient numbers to enable reference to key elevations and to permit control of critical grading and compaction operations.

~~12-13.~~ The Discharger shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) installed or used to achieve compliance with conditions of this Order. Proper operation and maintenance includes effective performance, and adequate laboratory and process controls including appropriate quality assurance procedures.

~~13-14.~~ The Discharger shall conduct periodic inspections at the Landfill to ensure the compliance of this Order. The inspections shall cover the final cover system, the water quality monitoring system, drainage system, landscaping, and any other systems at the site that may have an impact to water quality at the Landfill. Such inspections shall be documented and reported to the Regional Board in accordance with monitoring and reporting program (MRP) requirements.

~~14-15.~~ The Discharger shall report any noncompliance or any incident resulting from Landfill operations that are in violation of this Order. Any such information shall be provided by telephone or email to the Executive Officer within 24 hours from the time the Discharger becomes aware of the circumstances. A written submission shall also be provided within fourteen days of the time that the Discharger becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the

T
E
N
T
A
T
I
V
E

period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate, or prevent recurrence of the noncompliance. The Executive Officer, or an authorized representative, may waive the written report on a case-by-case basis if the verbal report has been received within 24 hours.

D. REQUIREMENTS FOR GROUNDWATER MONITORING

1. The Discharger shall implement the attached MRP No. CI-6198 (Attachment T), which is incorporated herein by reference, and revisions thereto, in order to detect at the earliest opportunity, any unauthorized discharge of waste constituents from the Landfill or any unreasonable impairment of beneficial uses caused by discharges of waste to the Landfill. MRP No. CI-6198 is designed to satisfy both federal and state regulatory monitoring requirements for the Landfill.
2. At any time, the Discharger may file a written request, including appropriate supporting documents, with the Executive Officer, proposing modifications to MRP No. CI-6198. The Discharger shall implement any changes to the revised MRP approved by the Executive Officer upon receipt of a signed copy of the revised MRP.
3. The Discharger shall furnish, under penalty of perjury, technical or monitoring program reports in accordance with CWC section 13267. Failure or refusal to furnish these reports or falsifying any information provided therein renders the Discharger guilty of a misdemeanor and subject to the penalties stated in CWC section 13268. Monitoring reports shall be submitted in accordance with the provisions contained in the attached MRP No. CI-6198, as directed by the Executive Officer.
4. The effectiveness of all monitoring wells, monitoring devices, and leachate and gas collection systems shall be maintained throughout the Landfill's closure, and postclosure maintenance periods in accordance with acceptable industry standards. The Discharger shall maintain a groundwater monitoring well preventative maintenance program (MWPMP) approved by the Executive Officer. Elements of the program should include a minimum of periodic visual inspections of well integrity, pump removal and inspection, and appropriate inspection frequencies. If a well or piezometer is found to be inoperative, the Regional Board shall be so informed in writing within seven days after such discovery, and this notification shall contain a time schedule for returning the well or piezometer to operating order. Changes to the existing program shall be submitted for approval of the Executive Officer at least 30 days prior to implementing the change(s).
5. If a well or piezometer is proposed to replace an inoperative well or piezometer identified in the MWPMP, the Discharger shall not delay replacement while waiting for approval of the Executive Officer. However, a technical report describing the location and construction details shall be submitted to the Executive Officer within 30 days.
6. The Discharger shall provide for proper handling and disposal of water purged from monitoring wells at the Landfill during sampling. Water purged from a monitoring well shall not be returned to that well (or any other Landfill well).
7. Any abandoned wells or bore holes under the control of the Discharger, and situated within the Landfill boundaries, must be located and properly modified or sealed to prevent mixing of any waters between adjacent water-bearing zones. A notice of intent

T
E
N
T
A
T
I
V
E

to decommission a well must be filed with the appropriate regulatory agencies prior to decommissioning. Procedures used to decommission these wells, or to modify wells still in use, must conform to the specifications of the local health department or other appropriate agencies.

8. For any monitoring wells installed at the Landfill in the future, the Discharger shall submit technical reports for approval by the Executive Officer prior to installation. These technical reports shall be submitted at least 60 days prior to the anticipated date of installation of the wells. These reports shall be accompanied by:
 - a. Maps and cross sections showing the locations of the monitoring points; and
 - b. Drawings and data showing construction details of the monitoring points. These data shall include:
 - i. casing and test hole diameter;
 - ii. casing materials;
 - iii. depth of each hole;
 - iv. the means by which the size and position of perforations shall be determined, or verified, if in the field;
 - v. method of joining sections of casing;
 - vi. nature of filter materials;
 - vii. depth and composition of soils; and
 - viii. method and length of time of well development.
9. The compliance point(s) where water quality protection standards (WQPS) apply shall be located along downgradient edges of the Landfill or an alternate location approved by the Executive Officer.
10. The compliance monitoring wells at the Landfill shall consist of those wells listed in Table T-1 of MRP No. CI-6198. All compliance monitoring wells shall be monitored pursuant to this Order and as directed by the Executive Officer through future revisions of MRP No. CI-6198.
11. As of the effective date of this Order, the Landfill's constituents of concern (COCs) are those listed in Table T-2 in the MRP.
12. In accordance with 27 CCR section 20390, the water quality protection standard (WQPS) for the Landfill is established as natural background groundwater quality at the site.
13. In accordance with 27 CCR section 20390(a), the WQPS shall apply during the closure period, the post closure maintenance period, and during any Landfill compliance period.
14. If necessary, the Discharger shall install additional groundwater, soil pore liquid, soil pore gas, or leachate monitoring devices necessary to comply with MRP No. CI-6198, as adopted or as revised by the Executive Officer.
15. Pursuant to 27 CCR 20415(d)(5), unsaturated zone groundwater monitoring at the Landfill is exempt.

T
E
N
T
A
T
I
V
E

T
E
N
T
A
T
I
V
E

E. REQUIREMENTS FOR ON-SITE USE OF WATER

1. No water shall be routinely applied to refuse fill areas except for landscape irrigation, surface dust control, road construction, final cover construction or non-emergency uses approved by the Executive Officer. Any water used at the Landfill, except for potable water, recycled water, and any other water allowed by the Executive Officer, shall be subject to these WDRs. Water used for these purposes shall be applied only in quantities not to exceed that is necessary to reduce immediate dust hazards, support plant life, or to achieve desired compaction. Overflow or runoff caused by the over-application or improper management of irrigation or dust control water are prohibited.
2. No wastewater shall leave the Landfill except as permitted by an NPDES permit issued in accordance with the federal Clean Water Act (CWA) and CWC.
3. During periods of precipitation, when the use of irrigation or dust control is not necessary for the purpose specified in this Order, all wastewater generated at the Landfill shall be stored, discharged to the sanitary sewer, or hauled to a legal point of disposal.
4. Washing of paved Landfill roads during rainy periods shall only occur when muddy roads create a safety concern. Washing of equipment or vehicles on the Landfill shall be confined to controlled areas where the wastewater is collected for proper disposal.
5. Wastewater used at the Landfill shall not percolate into the disposal areas or native soil, or enter stormwater collection systems, except as specifically permitted by this Order.
6. All uses of potable water, recycled, or wastewater shall be within the boundaries of the Landfill property. During an emergency, this water may be used for fighting fires on the Landfill or on undeveloped areas off and adjacent to the Landfill.

F. REQUIREMENTS FOR REPORTING SCHEDULED ACTIVITIES

1. The Discharger shall notify Regional Board staff at least 30 days prior to any maintenance activities, for approval by the Executive Officer, which could alter existing surface drainage patterns or change existing slope configurations. These activities may include, but not be limited to, significant grading activities, the importation of fill material, the design and installation of soil borings, groundwater monitoring wells and other devices for Landfill investigation purposes.
2. The Discharger shall furnish, within a reasonable time, any information the Regional Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Discharger shall also furnish to the Regional Board, upon request, copies of records required to be kept by this Order.
3. If the Discharger becomes aware that it failed to submit any relevant facts in any report to the Regional Board, it shall submit such facts or information within seven days of its discovery of the omission.
4. The Regional Board shall be notified of any incident resulting from Landfill closure or postclosure maintenance operations that may endanger the environment, by telephone or

email within 24 hours, and in writing within fourteen days. The written notification shall fully describe the incident including what occurred, when it occurred, the duration of the incident, when correction occurred (or when correction will occur if it is a continuing incident), and the steps taken or planned to reduce, eliminate, and/or prevent recurrence. All instances of noncompliance with this Order shall also be reported to the Regional Board in the same manner as stated above.

5. The Discharger shall notify the Executive Officer, in writing, at least 30 days in advance of any proposed transfer of this Order's responsibility and coverage between the Discharger and a new owner of the Landfill. Any transfer agreement between the Discharger and a new owner or operator shall include an acknowledgement that the Discharger is liable for violations up to the transfer date and that the new owner is liable from the transfer date on. The agreement shall include an acknowledgement that the new owners accept responsibility for compliance with this Order.
6. The Discharger shall report (on a semi-annual basis) the total volume of all irrigation water used at the Landfill each month and the area(s) where it is applied.
7. All applications, reports, or information submitted to the Executive Officer shall be signed and certified as follows:
 - a. The applications, reports, or information shall be signed as follows:
 - i. For a corporation - by a principal executive officer of at least the level of vice-president.
 - ii. For a partnership or sole proprietorship - by a general partner or the proprietor, respectively.
 - iii. For a municipality, state, federal or other public agency - by either a principal executive officer or ranking elected official.
 - iv. For a military installation - by the base commander or the person with overall responsibility for environmental matters in that branch of the military.
 - b. All other reports required by this Order and other information required by the Executive Officer shall be signed by a person designated in paragraph [a] of this provision, or by a duly authorized representative of that person. An individual is a duly authorized representative only if:
 - i. The authorization is made in writing by a person described in paragraph [a] of this provision;
 - ii. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity; and
 - iii. The written authorization is submitted to the Executive Officer.
 - c. Any person signing a document under this section shall make the following certification:

T
E
N
T
A
T
I
V
E

"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."

G. GENERAL PROVISIONS

1. This Order does not authorize violation of any federal, state, or local laws or regulations.
2. The Discharger shall comply with all the other applicable provisions, requirements, and procedures contained in the most recent version of 27 CCR and any future amendments.
3. The Discharger has a continuing responsibility for correcting any problems which may arise in the future as a result of waste discharged at the Landfill, and from gases and leachate that may be caused by infiltration or precipitation of drainage waters into the waste disposal units, or by infiltration of water applied to this property during subsequent use of the land or other purposes.
4. The Discharger shall allow the Regional Board staff, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the Discharger's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;
 - b. Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this Order;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
 - d. Sample or monitor at reasonable times, for the purpose of assuring compliance with this Order or as otherwise authorized by the CWC, any substances or parameters at this location.
5. The Discharger shall maintain a copy of this Order so as to be available at all times to Landfill operating personnel.
6. These requirements do not exempt the Discharger from compliance with any other current or future law that may be applicable. They do not legalize this waste management facility, and they leave and do not affect further restraints on the disposal of wastes at this waste management facility that may be contained in other statutes.
7. This Order includes the attached "Standard Provisions Applicable to Waste Discharge Requirements", adopted November 7, 1990 (Attachment W) which is incorporated herein by reference.
8. The requirements adopted herein do not authorize the commission of any act causing injury to the property of another, nor protect the Discharger from liabilities under federal,

T
E
N
T
A
T
I
V
E

state, or local laws.

9. The filing of a request by the Discharger for a modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition, provision, or requirements of this Order.
10. This Order does not convey any property rights of any sort, or any exclusive privilege.
11. The Discharger is the responsible party for these WDRs and any MRP for the Landfill. The Discharger shall comply with all conditions of these WDRs. Violations may result in enforcement actions, including regional board orders, or court orders, requiring corrective action or imposing civil monetary liability, or in modification or revocation of these WDRs by the Regional Board.
12. The Discharger shall within 48 hours of a significant earthquake event, provide an initial verbal assessment to the Regional Board of any earthquake damage at the Landfill. A detailed post-earthquake report describing any physical damages to the containment features, groundwater monitoring and/or leachate control facilities and a corrective action plan to be implemented at the Landfill shall be submitted to the Regional Board with thirty days of the earthquake event. A significant earthquake is herein defined as an earthquake event above Richter Magnitude 5.0 within a 100 kilometer radius of the property boundaries of the Landfill site, or as measured as a VI on the Modified Mercalli Scale.
13. The Discharger shall immediately notify the Regional Board of any flooding, slope failure or other change in Landfill conditions which could impair the integrity of waste containment facilities or of precipitation and drainage control structures.
14. The Discharger shall submit to the Regional Board and CalRecycle evidence of financial assurance for postclosure maintenance, pursuant to 27 CCR, division 2, chapter 6. The postclosure period shall be at least 30 years. However, the postclosure shall extend as long as wastes pose a threat to water quality.
15. The Discharger shall comply with all conditions of this Order and any additional conditions prescribed by the Regional Board in addenda thereto. Noncompliance with this Order constitutes a violation of the CWC and is grounds for:
 - a. enforcement action;
 - b. termination, revocation and reissuance, or modification of this Order; or
 - c. denial of a Report of Waste Discharge in application for new or revised WDRs.
16. The Discharger shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this Order, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the noncompliance.
17. This Order is not transferable to any person except after notice to the Executive Officer. The Regional Board may require modification or revocation and reissuance of this Order to change the name of the discharger and incorporate such other requirements as may be necessary under the CWC. The Discharger shall submit notice of any proposed transfer of

T
E
N
T
A
T
I
V
E

this Order's responsibility and coverage as described under [Provision No. F.5](#) of this Order.

18. In accordance with CWC section 13263(g), these requirements shall not create a vested right to continue to discharge and are subject to rescission or modification. All discharges of waste into the waters of the state are privileges, not rights.
19. The provisions of this Order are severable, and if any provision of this Order, or the application of any provision of this Order to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Order, shall not be affected thereby.
20. This Order becomes effective on the date of adoption by the Regional Board.
21. This Order may be terminated or modified for cause, including, but not limited to:
 - a. Violation of any term or condition contained in this Order;
 - b. Obtaining this Order by misrepresentation, or failure to disclose all relevant facts;
 - c. A change in any condition that required either a temporary or permanent reduction or elimination of the authorized waste discharge.
22. This Order in no way limits the authority of the Regional Board, as contained in the CWC, to require additional investigations and cleanups pertinent to this project. This Order may be revised by the Executive Officer as additional information from the project becomes available.
23. Failure to comply with the terms and conditions of this Order may result in imposition of civil liability against the Discharger by the Regional Board, either by the Regional Board or judicially by the Superior Court, in accordance with CWC section 13350 et. seq. and/or referral to the Attorney General of the State of California for such legal action as may be deemed appropriate.

H. TERMINATIONS

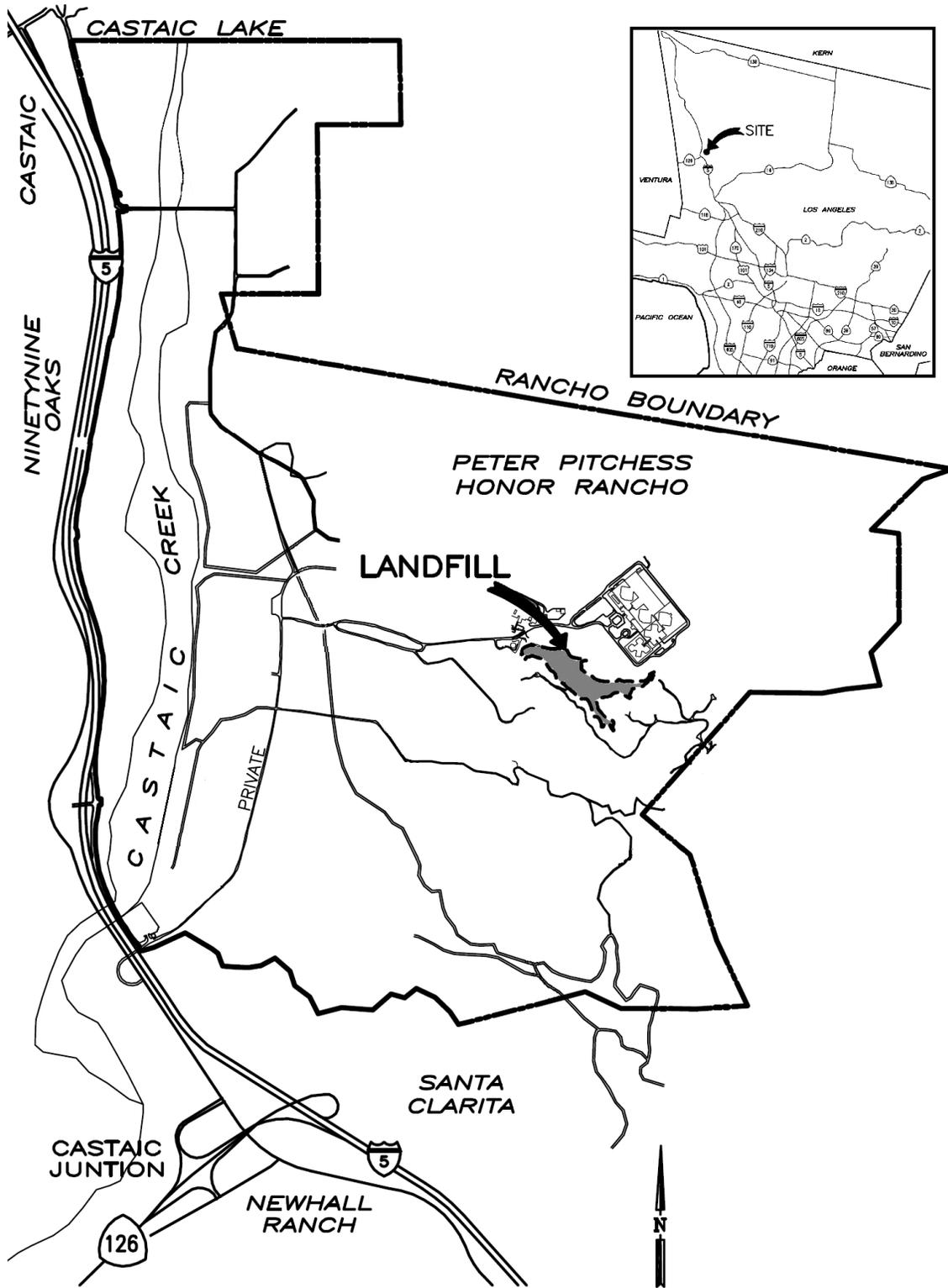
1. Except for violation enforcement purposes, Regional Board Order No. 01-133, adopted September 19, 2001, is hereby terminate.
2. Because requirements applying a federal closure, postclosure maintenance, groundwater monitoring, corrective action program are incorporated into this Order, the Landfill is no longer subject to Regional Board Order No. 93-062 requirements.

I, Samuel Unger, Executive Officer, do certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on November 6, 2014.

Samuel Unger, P.E.
Executive Officer

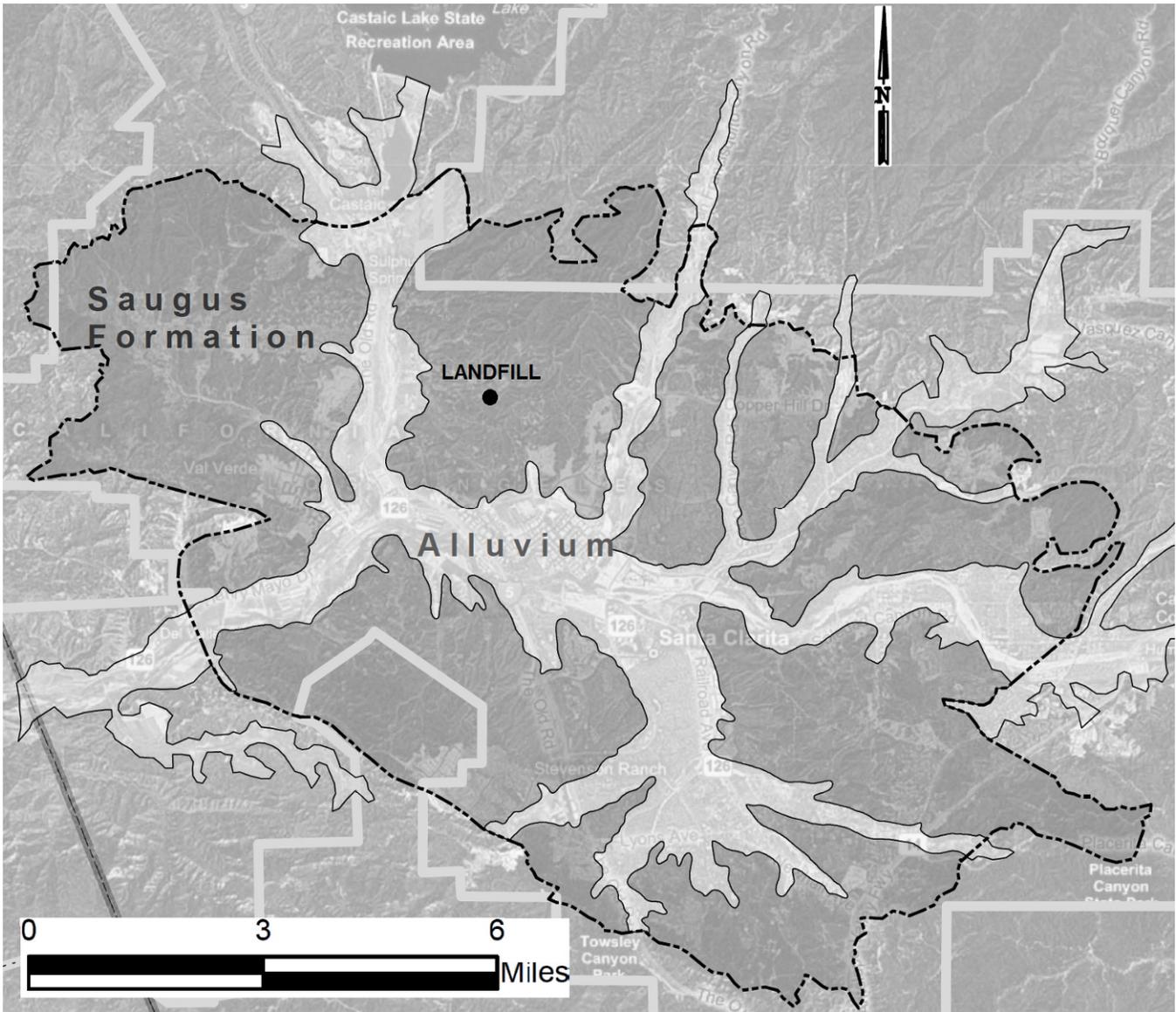
T
E
N
T
A
T
I
V
E

FIGURE 1:
LOCATION MAP



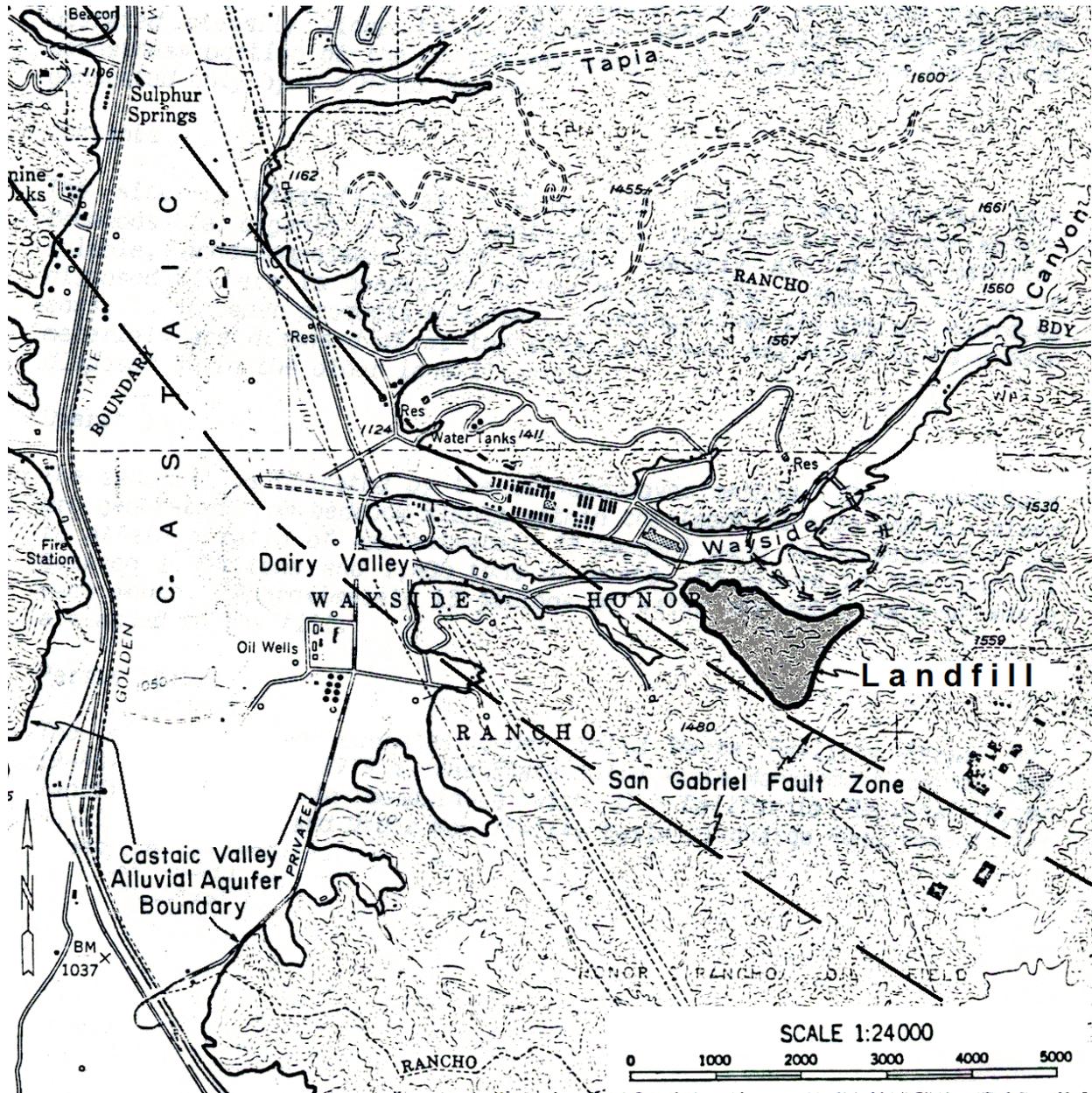
T
E
N
T
A
T
I
V
E

**FIGURE 2:
GROUNDWATER AQUIFERS**



T
E
N
T
A
T
I
V
E

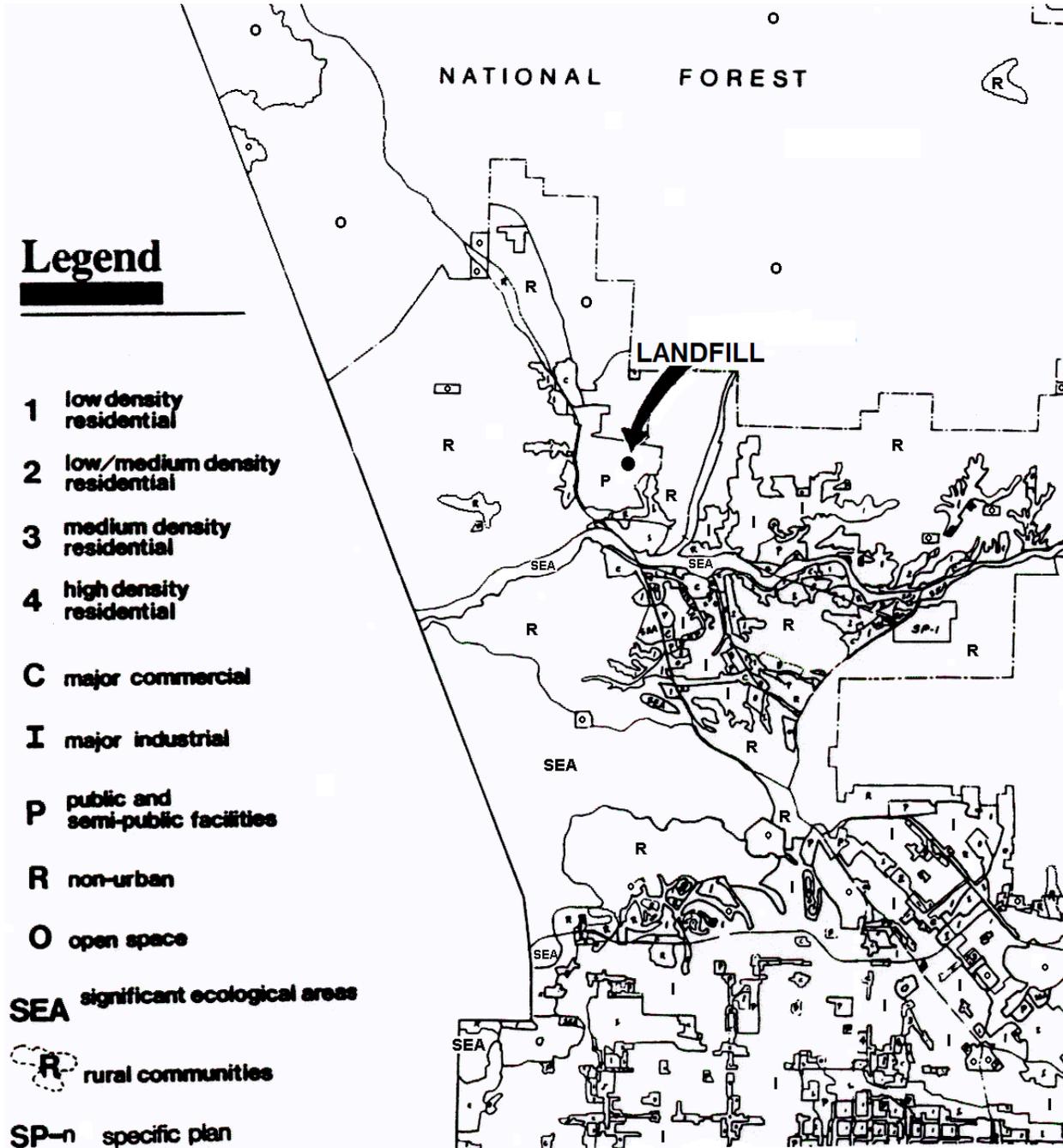
FIGURE 3:
GEOMORPHIC SETTING



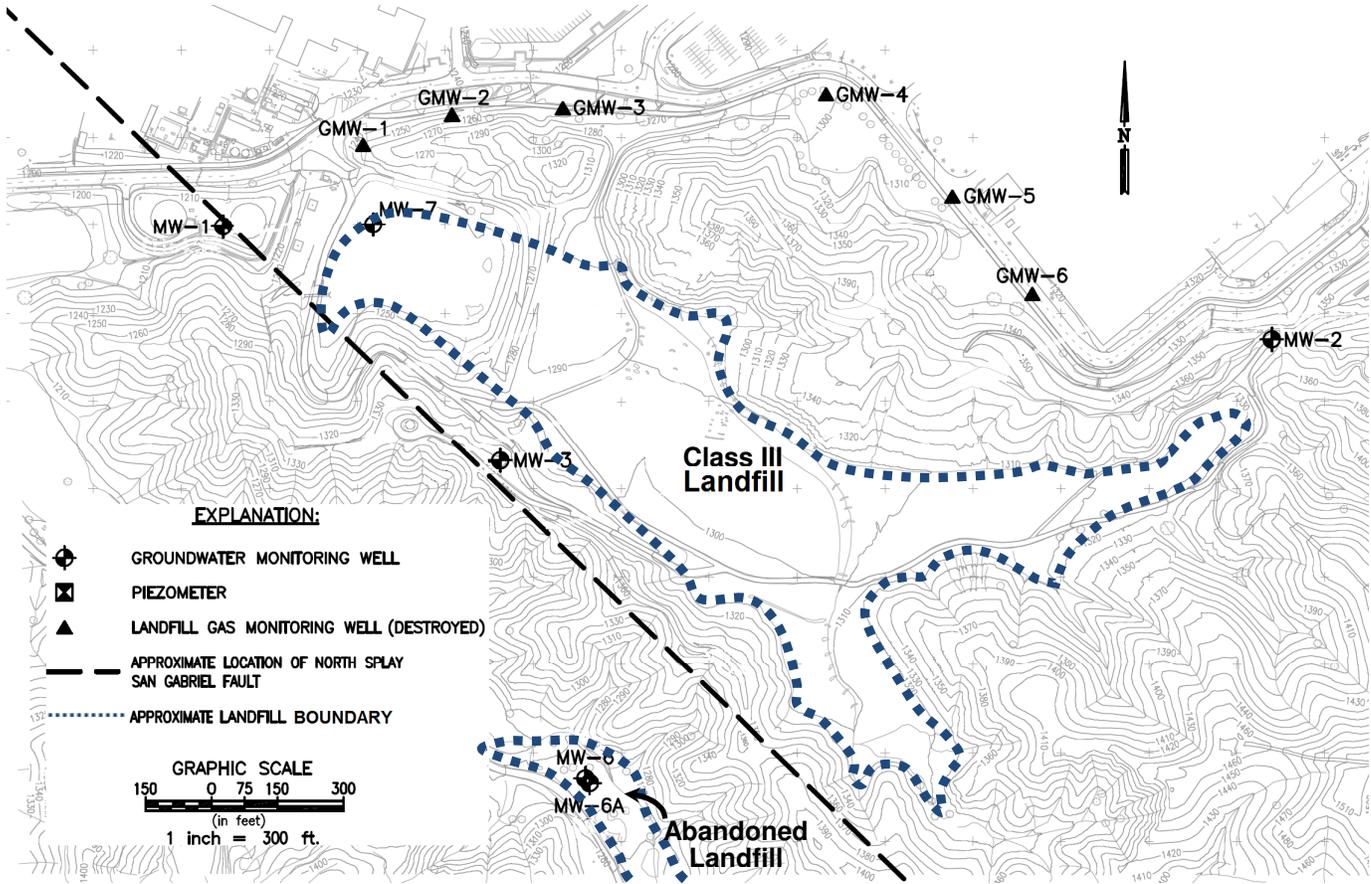
T
E
N
T
A
T
I
V
E

FIGURE 4:
AREA LAND USE MAP

T
E
N
T
A
T
I
V
E



**FIGURE 5:
 GROUNDWATER MONITORING NETWORK**



T
 E
 N
 T
 A
 T
 I
 V
 E

STANDARD PROVISIONS
APPLICABLE TO WASTE DISCHARGE REQUIREMENTS

1. DUTY TO COMPLY

The discharger must comply with all conditions of these waste discharge requirements. A responsible party has been designated in the Order for this project, and is legally bound to maintain the monitoring program and permit. Violations may result in enforcement actions, including Regional Board orders or court orders requiring corrective action or imposing civil monetary liability, or in modification or revocation of these waste discharge requirements by the Regional Board. [CWC Section 13261, 13263, 13265, 13268, 13300, 13301, 13304, 13340, 13350]

2. GENERAL PROHIBITION

Neither the treatment nor the discharge of waste shall create a pollution, contamination or nuisance, as defined by Section 13050 of the California Water Code (CWC). [H&SC Section 5411, CWC Section 13263]

3. AVAILABILITY

A copy of these waste discharge requirements shall be maintained at the discharge facility and be available at all times to operating personnel. [CWC Section 13263]

4. CHANGE IN OWNERSHIP

The discharger must notify the Executive Officer, in writing at least 30 days in advance of any proposed transfer of this Order's responsibility and coverage to a new discharger containing a specific date for the transfer of this Order's responsibility and coverage between the current discharger and the new discharger. This agreement shall include an acknowledgement that the existing discharger is liable for violations up to the transfer date and that the new discharger is liable from the transfer date on. [CWC Sections 13267 and 13263]

5. CHANGE IN DISCHARGE

In the event of a material change in the character, location, or volume of a discharge, the discharger shall file with this Regional Board a new Report of Waste Discharge. [CWC Section 13260(c)]. A material change includes, but is not limited to, the following:

- (a) Addition of a major industrial waste discharge to a discharge of essentially domestic sewage, or the addition of a new process or product by an industrial facility resulting in a change in the character of the Waste.

November 7, 1990
WDR

T
E
N
T
A
T
I
V
E

Standard Provisions Applicable to
Waste Discharge Requirements

- (b) Significant change in disposal method, e.g., change from a land disposal to a direct discharge to water, or change in the method of treatment which would significantly alter the characteristics of the waste.
- (c) Significant change in the disposal area, e.g., moving the discharge to another drainage area, to a different water body, or to a disposal area significantly removed from the original area potentially causing different water quality or nuisance problems.
- (d) Increase in flow beyond that specified in the waste discharge requirements.
- (e) Increase in the area or depth to be used for solid waste disposal beyond that specified in the waste discharge requirements. [CCR Title 23 Section 2210]

6. REVISION

These waste discharge requirements are subject to review and revision by the Regional Board. [CCR Section 13263]

7. TERMINATION

Where the discharger becomes aware that it failed to submit any relevant facts in a Report of Waste Discharge or submitted incorrect information in a Report of Waste Discharge or in any report to the Regional Board, it shall promptly submit such facts or information. [CWC Sections 13260 and 13267]

8. VESTED RIGHTS

This Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, do not protect the discharger from his liability under Federal, State or local laws, nor do they create a vested right for the discharger to continue the waste discharge. [CWC Section 13263(g)]

9. SEVERABILITY

Provisions of these waste discharge requirements are severable. If any provision of these requirements are found invalid, the remainder of the requirements shall not be affected. [CWC Section 921]

T
E
N
T
A
T
I
V
E

Standard Provisions Applicable to
Waste Discharge Requirements

10. OPERATION AND MAINTENANCE

The discharger shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the discharger to achieve compliance with conditions of this Order. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Order. [CWC Section 13263(f)]

11. HAZARDOUS RELEASES

Except for a discharge which is in compliance with these waste discharge requirements, any person who, without regard to intent or negligence, causes or permits any hazardous substance or sewage to be discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, shall, as soon as (a) that person has knowledge of the discharge, (b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State toxic disaster contingency plan adopted pursuant to Article 3.7 (commencing with Section 8574.7) of Chapter 7 of Division 1 of Title 2 of the Government Code, and immediately notify the State Board or the appropriate Regional Board of the discharge. This provision does not require reporting of any discharge of less than a reportable quantity as provided for under subdivisions (f) and (g) of Section 13271 of the Water Code unless the discharger is in violation of a prohibition in the applicable Water Quality Control plan. [CWC Section 1327(a)]

12. PETROLEUM RELEASES

Except for a discharge which is in compliance with these waste discharge requirements, any person who without regard to intent or negligence, causes or permits any oil or petroleum product to be discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, shall, as soon as (a) such person has knowledge of the discharge, (b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State oil spill contingency plan adopted pursuant to Article 3.5 (commencing with Section 8574.1) of Chapter 7 of Division 1 of Title 2 of the Government Code. This provision does not require reporting of any discharge of less than 42 gallons unless the discharge is also required to be reported pursuant to Section 311 of the Clean Water Act or the discharge is in violation of a prohibition in the applicable Water Quality Control Plan. [CWC Section 13272]

T
E
N
T
A
T
I
V
E

Standard Provisions Applicable to
Waste Discharge Requirements

13. ENTRY AND INSPECTION

The discharger shall allow the Regional Board, or an authorized representative upon the presentation of credentials and other documents as may be required by law, to:

- (a) Enter upon the discharger's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
- (d) Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order, or as otherwise authorized by the California Water Code, any substances or parameters at any location. [CWC Section 13267]

14. MONITORING PROGRAM AND DEVICES

The discharger shall furnish, under penalty of perjury, technical monitoring program reports; such reports shall be submitted in accordance with specifications prepared by the Executive Officer, which specifications are subject to periodic revisions as may be warranted. [CWC Section 13267]

All monitoring instruments and devices used by the discharger to fulfill the prescribed monitoring program shall be properly maintained and calibrated as necessary to ensure their continued accuracy. All flow measurement devices shall be calibrated at least once per year, or more frequently, to ensure continued accuracy of the devices. Annually, the discharger shall submit to the Executive Office a written statement, signed by a registered professional engineer, certifying that all flow measurement devices have been calibrated and will reliably achieve the accuracy required.

Unless otherwise permitted by the Regional Board Executive officer, all analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services. The Regional Board Executive Officer may allow use of an uncertified laboratory under exceptional circumstances, such as when the closest laboratory to the monitoring location is outside the State boundaries and therefore not subject to certification. All analyses shall be required to be conducted in accordance with the latest edition of "Guidelines Establishing Test Procedures for Analysis of Pollutants" [40CFR Part 136] promulgated by the U.S. Environmental Protection Agency. [CCR Title 23, Section 2230]

T
E
N
T
A
T
I
V
E

Standard Provisions Applicable to
Waste Discharge Requirements

15. TREATMENT FAILURE

In an enforcement action, it shall not be a defense for the discharger that it would have been necessary to halt or to reduce the permitted activity in order to maintain compliance with this Order. Upon reduction, loss, or failure of the treatment facility, the discharger shall, to the extent necessary to maintain compliance with this Order, control production or all discharges, or both, until the facility is restored or an alternative method of treatment is provided. This provision applies, for example, when the primary source of power of the treatment facility fails, is reduced, or is lost. [CWC Section 13263(f)]

16. DISCHARGE TO NAVIGABLE WATERS

Any person discharging or proposing to discharge to navigable waters from a point source (except for discharge of dredged or fill material subject to Section 404 fo the Clean Water Act and discharge subject to a general NPDES permit) must file an NPDES permit application with the Regional Board. [CCR Title 2 Section 22357]

17. ENDANGERMENT TO HEALTH AND ENVIRONMENT

The discharger shall report any noncompliance which may endanger health or the environment. Any such information shall be provided verbally to the Executive Officer within 24 hours from the time the discharger becomes aware of the circumstances. A written submission shall also be provided within five days of the time the discharger becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected; the anticipated time it is expected to continue and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Executive officer, or an authorized representative, may waive the written report on a case-by-case basis if the oral report has been received within 24 hours. The following occurrence(s) must be reported to the Executive Office within 24 hours:

- (a) Any bypass from any portion of the treatment facility.
- (b) Any discharge of treated or untreated wastewater resulting from sewer line breaks, obstruction, surcharge or any other circumstances.
- (c) Any treatment plan upset which causes the effluent limitation of this Order to be exceeded. [CWC Sections 13263 and 13267]

18. MAINTENANCE OF RECORDS

The discharger shall retain records of all monitoring information including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies off all reports required by this Order, and record of all data used

T
E
N
T
A
T
I
V
E

Standard Provisions Applicable to
Waste Discharge Requirements

to complete the application for this Order. Records shall be maintained for a minimum of three years from the date of the sample, measurement, report, or application. This period may be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Board Executive Officer.

Records of monitoring information shall include:

- (a) The date, exact place, and time of sampling or measurement;
 - (b) The individual(s) who performed the sampling or measurement;
 - (c) The date(s) analyses were performed;
 - (d) The individual(s) who performed the analyses;
 - (e) The analytical techniques or method used; and
 - (f) The results of such analyses.
19. (a) All application reports or information to be submitted to the Executive Office shall be signed and certified as follows:
- (1) For a corporation – by a principal executive officer or at least the level of vice president.
 - (2) For a partnership or sole proprietorship – by a general partner or the proprietor, respectively.
 - (3) For a municipality, state, federal, or other public agency – by either a principal executive officer or ranking elected official.
- (b) A duly authorized representative of a person designated in paragraph (a) of this provision may sign documents if:
- (1) The authorization is made in writing by a person described in paragraph (a) of this provision.
 - (2) The authorization specifies either an individual or position having responsibility for the overall operation of the regulated facility or activity; and
 - (3) The written authorization is submitted to the Executive Officer.

Any person signing a document under this Section shall make the following certification:

T
E
N
N
T
A
T
I
V
E

Standard Provisions Applicable to
Waste Discharge Requirements

"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. [CWC Sections 13263, 13267, and 13268]"

20. OPERATOR CERTIFICATION

Supervisors and operators of municipal wastewater treatment plants and privately owned facilities regulated by the PUC, used in the treatment or reclamation of sewage and industrial waste shall possess a certificate of appropriate grade in accordance with Title 23, California Code of Regulations Section 3680. State Boards may accept experience in lieu of qualification training. In lieu of a properly certified wastewater treatment plant operator, the State Board may approve use of a water treatment plant operator of appropriate grade certified by the State Department of Health Services where reclamation is involved.

Each plan shall be operated and maintained in accordance with the operation and maintenance manual prepared by the municipality through the Clean Water Grant Program [CWC Title 23, Section 2233(d)]

ADDITIONAL PROVISIONS APPLICABLE TO
PUBLICLY OWNED TREATMENT WORKS' ADEQUATE CAPACITY

21. Whenever a publicly owned wastewater treatment plant will reach capacity within four years the discharger shall notify the Regional Board. A copy of such notification shall be sent to appropriate local elected officials, local permitting agencies and the press. The discharger must demonstrate that adequate steps are being taken to address the capacity problem. The discharger shall submit a technical report to the Regional Board showing flow volumes will be prevented from exceeding capacity, or how capacity will be increased, within 120 days after providing notification to the Regional Board, or within 120 days after receipt of notification from the Regional Board, of a finding that the treatment plant will reach capacity within four years. The time for filing the required technical report may be extended by the Regional Board. An extension of 30 days may be granted by the Executive Officer, and longer extensions may be granted by the Regional Board itself. [CCR Title 23, Section 2232]

T
E
N
T
A
T
I
V
E

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI-6198
FOR
COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT
(PETER PITCHESS LANDFILL)

(File No. 75-014)

GENERAL

1. Monitoring responsibilities of the County of Los Angeles Sheriff's Department (Discharger) for the Peter Pitchess Landfill (Landfill) are specified in California Water Code (CWC) section 13225(a), section 13267(b) and section 13387(b), and State Water Resources Control Board (State Board) Resolution No. 93-62. This self-monitoring program is issued pursuant to California Regional Water Quality Control Board, Los Angeles Region (Regional Board) Order No. R4-2014-XXXX (Order). The principal purposes of a self-monitoring program by a waste discharger are:
 - a. To document compliance with discharge requirements and prohibitions established by the Regional Board;
 - b. To facilitate self-policing by the waste Discharger in the prevention and abatement of pollution arising from waste discharge; and
 - c. To prepare water quality analyses.
2. The Discharger shall implement this monitoring and reporting program (MRP) as described in section D (Requirements for Groundwater Monitoring) of the Order. The Discharger shall implement this MRP during the first monitoring period immediately following adoption of the Order.
3. The Discharger shall comply with the requirements of title 27 of the California Code of Regulations (27 CCR) section 20415 for any water quality monitoring program developed to satisfy 27 CCR section 20420, section 20425, or section 20430 and the requirements of the Order. Groundwater monitoring shall meet the requirements of 27 CCR section 20415(b) and 40 CFR section 258.51 (a, c, and d);

Monitoring Program

4. The groundwater monitoring network at the Landfill shall include all groundwater monitoring wells listed in Table T-1. The Regional Board Executive Officer (Executive Officer) may require the Discharger to install additional groundwater monitoring wells in response to the detection of a release of pollutant from the Landfill or other change in site conditions.
5. Unless otherwise approved by the Executive Officer, groundwater monitoring at the Landfill shall be conducted semi-annually, starting in April and October of each year. In the event monitoring is not performed as above because of unforeseen circumstances, substitute

T
E
N
T
A
T
I
V
E

monitoring shall be performed as soon as possible after these times, and the reason for the delay shall be reported in the semiannual report submitted to the Regional Board.

6. Constituents of Concern (COCs) - As of the effective date of the Order, the Landfill's COCs are listed in Table T-2 and consist of constituents for which the Regional Water Board would require a corrective action response, if they were included in a release, plus every constituent in Appendix I and Appendix II (to 40 CFR Part 258).
7. Monitoring Parameter (Mpar) List - This list, which is identified as a portion of the COCs in Table T-2, includes several inorganic "Metals Surrogates" which take the place of the fifteen federal metallic constituent Mpars [as allowed by 40 CFR section 258.54(a)(2)], all volatile organic compounds (VOCs) that are COCs, and any Mpar that is in Tracking Mode per Item No. 14.e.ii of this MRP.
8. Concentration Limits - In accordance with 27 CCR section 20400(a)(1), the concentration limit of each COCs in groundwater at the Landfill is established as the background value of that constituent. The best indication of the population mean ("background value") is the mean of a group of at least eight background data points that represent what one would expect to see, at that well, in the absence of the effect of any release. Therefore, the "Concentration Limit" for any COCs is its respective background data set. One applies an appropriate statistical or non-statistical data analysis method to this group of background data points to determine its "Threshold Value" (do-not-exceed concentration). An exceedance of this Threshold Value, if validated by retesting, causes that well/Mpar pair to change from "Detection Mode" (no release indicated) to "Tracking Mode" (release indicated). The "Threshold Value" for a COCs is either the upper prediction limit derived from historical monitoring data in accordance with 27 CCR section 20415(e)(7) (for constituents naturally exist in the groundwater) or its PQL (for constituents that do not naturally exist in the groundwater).
9. The current Threshold Values (upper prediction limits) for all Metals Surrogates and VOCs at all detection monitoring wells at the Landfill are listed in Table T-3. The Discharger shall update the Threshold Values in its annual report submitted to the Regional Board for the Landfill in accordance with Item 13 of this MRP.
10. Annual Non-COCs Scan - the Discharger shall take one groundwater sample from monitoring well MW-7 that is downgradient to the unlined Landfill in September of each year and shall analyze the samples for emergent chemicals including 1,4-Dioxane, 1,2,3-Trichloropropane, Perchlorate, and N-Nitrosodimethylamine (NDMA). If the September non-COCs scan identifies any previously undetected (i.e. the constituent does not exceed its respective PQL concentration) emergent chemical(s) in any groundwater sample, the Discharger shall obtain a single retest sample from that source the following March and analyze it for all such new constituents. Any constituents verified in the March retest shall become part of the COCs list, with new VOCs going onto the Mpar list and non-VOCs going onto the "Other COCs" listed in Table 2. The Discharger shall include a prominent notification of these new COCs in the next scheduled monitoring report.
11. Five-Year COCs Scan - Every five years, starting in 20152016, the Discharger shall analyze a sample from each groundwater monitoring point and test for all "Other COCs" in Table T-2 that are present at a concentration in excess of their respective Threshold Value. The threshold value is the upper-85th-percentile-concentration of eight or more data points of background data). This constitutes the means by which the Discharger continues to meet

T
E
N
T
A
T
I
V
E

the requirements of 40 CFR 258.55(b)-(d). During each such COCs scanning event, the Discharger shall obtain and analyze a minimum of one sample from each monitoring well (sufficient to obtain a datum for each COCs that is subject to the scan). Upon detecting a COCs in excess of its Threshold Value, the Discharger shall, within 90 days, take a single resample from the indicating affected well(s) and reanalyze it only for the newly-detected constituent(s). Any COCs that exceeds its respective Threshold Value in both the initial and the retest scan samples automatically becomes part of the Mpar list for the Landfill. This constitutes the means by which the Discharger shall meet the requirements of 40 CFR 258.55(d)(2).

12. The Discharger shall satisfy all stormwater monitoring requirements pursuant to any Regional Board order, State Board order, or Executive Officer directive regulating surface water discharges.
13. Moving Window Concentration Limits - Unless otherwise directed by the Executive Officer, all well/COCs pair statistic testing for the Landfill shall use the "intra-well comparison" approach whereby the concentration limit (reference background data set) is derived from each well's historic data. Beginning in April 2015, the Discharger shall develop concentrations limits for all Mpars at all groundwater monitoring wells using data obtained in the past five (5) years. Thereafter, the concentration limits shall be updated biannually by adding monitoring data obtained in the past two years and retiring the oldest two-year data in the database. The Discharger shall report the updated background data set, for each such well/Mpar pair, in each Annual Summary Monitoring Report required in this MRP. Concentration limits for new well/COCs pairs shall be developed when eight or more data points are available for the well/Mpar pair. During the biannual update of constituent concentration limits, the Discharger shall conduct a statistics-based trend analysis for all monitoring parameters (MPars) that are in Tracking Mode. If the results of the analysis indicate an increasing trend for an MPar, the Discharger may submit a technical report to the Regional Board, for the approval of the Executive Officer, prior to the next semiannual monitoring event if there is evidence that the increasing trend is the result of natural variability in groundwater and not related to a Landfill release. Otherwise the Discharger shall increase the monitoring interval for the MPar to quarterly and shall report monitoring results in the subsequent semiannual report submitted to the Regional Board.
14. Statistical Data Analysis Methodology
 - a. For the purposes of this MRP, Minimum Level (ML) and Reporting Limit (RL) are functionally equivalent to method detection limit (MDL) and practical quantitation limit (PQL) with regard to reporting and statistical evaluation requirements. For this purpose, MLs and RLs shall be derived by the laboratory for each analytical procedure, according to the State Board's Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (the State Implementation Policy or SIP) and the State of California's laboratory accreditation procedures. Sample results greater than or equal to the method detection limit (MDL) or practical quantitation limit (PQL) shall be reported "as measured" by the laboratory. Sample results less than the MDL/PQL shall be reported as less than the numeric values of the MDL/PQL. Nominal MDL and PQL values shall be reported with all data. Correspondingly, any reference to "detections at or above the trace level" shall be substituted with "detections at or above the Method Detection Limit".

T
E
N
T
A
T
I
V
E

- b. Performance Standards - Pursuant to 27 CCR 20415(e)(8), in cases where the Discharger proposes to use a non-statistical data analysis method, the Discharger shall demonstrate that it meets the performance standard given in 27 CCR 20415(e)(8). For the purposes of this paragraph, pursuant to authority under 27 CCR 20080(a)(1), the error rate restrictions of 27 CCR 20415(e)(9)(B) do not apply to any statistical method that (including its retesting approach) meets or exceeds the USEPA's reference power curve (Unified Guidance, 2009, USEPA publication EPA 530-R-09-007).
- c. Retest is Part of the Method - In the event that an approved data analysis method provides a preliminary indication that a given COCs has exhibited a measurably significant increase at a given well, the Discharger shall conduct a verification procedure either in the form of a discrete retest, in accordance with 27 CCR section 20415(e)(8)(E), or, pursuant to 27 CCR 20080(a)(l), any of the better-performing retesting options (e.g., the pass-1-of-3 approach) in which the triggering concentration is lowered to counter the adverse effect that retesting would otherwise have on the data analysis method's false-negative rate (compared with a no retest pass-1-of-1 approach). Nevertheless, any approved non-statistical method used for data analysis shall use a pass-1-of-2 retesting approach as provided in Item 15.b of this MRP. The retest is part of the data analysis method, therefore, a measurably significant increase exists only if the retesting does not countermand the preliminary indication, according to the retesting formula. The Discharger has the discretion to accept that the preliminary indication confirms a measurably significant increase at a given monitoring well and forgo verification retesting procedures.
- d. Limited Retest Scope - For any given groundwater monitoring point, the Discharger shall perform the verification procedure only for those Mpars that have shown a preliminary indication at that well during that reporting period. At any time, the Discharger may demonstrate, in accordance with 27 CCR section 20420(k)(7), that a source other than the Landfill caused an Mpar to produce a measurably significant increase at a given well or that the evidence is an artifact caused by an error in sampling, analysis, or statistical evaluation, or by natural variation in groundwater.
- e. Water Quality Monitoring Approach - The monitoring approach used for each well/Mpar pair shall be controlled by whether that Mpar has exhibited a measurably significant increase at that well. Therefore, the Discharger shall monitor each well/Mpar pair in one of two modes, as follows:
 - i. Detection Mode - For an Mpar that has not produced a measurably significant increase at that well, the purpose of monitoring, for that well/Mpar pair, is to watch for the Mpar's arrival at that well at a concentration in excess of its respective Threshold Value; or
 - ii. Tracking Mode - For an Mpar that has produced a measurably significant increase at a given well, the purpose of the monitoring, for that well/Mpar pair, is to verify the suitability and effectiveness of the existing or proposed corrective measures by tracking changes in the Mpar concentration at that location via an evolving concentration versus- time plot. For any well/Mpar pair placed into Tracking Mode, its pre-tracking mode Concentration Limit shall be plotted as a horizontal line on all corresponding concentration-versus-time plots. The Concentration Limit for the well/Mpar pair shall not be recalculated while the well/Mpar pair is in Tracking Mode. The goal is to indicate when the applied corrective action measures have brought the

T
E
N
T
A
T
I
V
E

Mpar concentration down to, or below, this concentration. These plots shall be the primary input for the Discharger's semiannual analysis of the effectiveness of the corrective action measures.

- f. Detection Mode Data Analyses - The following applies to all detection mode data analyses (i.e., this provision does not apply to well/Mpar pairs that are in tracking mode):
 - i. Mpars Readily Detectable in Background - At any given groundwater monitoring point, the Discharger shall apply an approved statistical analysis method for each detection mode Mpar that exceeds its respective MDL in 10% or more of the applicable background data set. For each well/Mpar pair (separately), an approved statistical analysis is a method, other than analysis of variance (ANOVA), that is either validated and analyzed by the SANITAS® water quality data analysis software (distributed by Intelligent Decisions Technology, Inc., 22052 W 66th Street, Suite 133, Shawnee, KS 66226, Tel: (913) 829-1470) or that the Executive Officer agrees meets the performance standards of 27 CCR section 20415(e)(9). For any statistical data analysis method that is not validated by comparison to the USEPA's Reference Power Curve, if using SANITAS®, the Discharger shall use the "CA Standards" and "CA Retest" settings (under the "Options" pull-down menu).
 - ii. Mpars not Readily Detectable in Background- For any monitoring point at which one or more detection mode Mpars exceed their respective MDL in less than 10% of the applicable background data set, the Discharger shall analyze the data for these Mpars via the California Non-statistical Data Analysis Method (CNSDAM) test described in Item No. 15 of this MRP.

15. California Non-statistical Data Analysis Method

- a. Non-Statistical Method for Detection Mode for Mpars Seldom Found in Background - For any given compliance (downgradient) well, regardless of the monitoring program (Detection Monitoring Program [DMP], Evaluation Monitoring Program [EMP], Assessment Monitoring Program [AMP], or Corrective Action Program [CAP]), the Discharger shall use this data analysis method, jointly, for all constituents on the "scope list" of Item No. 15(a)(i), below (or, for each retest sample, the modified scope list of Item No. 15(b)(ii), below).
 - i. Scope List – Within 90 days of the effective date of the Order, the Discharger shall create a current "scope list" showing each detection mode Mpar, at that well, that exceeds its MDL in less than 10% of its background data.
 - ii. Two Triggers - From the scope list made under Item No. 15(a)(i), above, for an initial test (or, for a retest, the modified scope list under Item No. 15(b)(ii) below), the Discharger shall identify each Mpar in the current sample from that well that exceeds either its respective MDL or PQL. The Discharger shall conclude that these exceeding Mpars provide a preliminary indication (or, for a retest, provide a measurably significant indication) of a change in the nature or extent of the release, at that well, if either:
 - A. Three or more of the Mpars on a monitoring well's scope list exceed their respective MDL; or

T
E
N
N
T
A
T
I
V
E

- B. At least one of the Mpars on a monitoring well's scope list equals or exceeds its respective PQL.
- b. Single Retest (pass 1-of-2 approach):
- i. In the event that the Discharger concludes (pursuant to Item No. 15(a)(ii) above) that there is a preliminary indication, then the Discharger shall immediately notify Regional Board staff by phone, followed by more formal notification via fax, email, or writing within fourteen days and inclusion of a notice thereof in the facility operating record. The Discharger shall, within 90 days of such indication, collect one new (retest) sample from the indicating compliance well.
 - ii. For any given compliance well, the Discharger shall analyze the retest samples only for those constituents indicated in that well's original test, under Item No. 15(a)(ii), above, and these indicated constituents shall comprise the well's "modified scope list." As soon as the retest data are available, the Discharger shall apply the same test (under Item No. 15(a)(ii), above, but using this modified scope list) to separately analyze each of the retest data at that compliance well.
 - iii. If the retest sample triggers either (or both) of the triggers under Item No. 15(a)(ii), above, then the Discharger shall conclude that there is a measurably significant increase at that well for the constituent(s) indicated in both the original and in the retest sample (i.e., not including constituents triggering in only one of the two samples). Thereafter, the Discharger: shall monitor the indicated constituent(s) in tracking mode instead of detection mode; (see Item No. 14(f)(ii), above) at that well; shall eliminate it from the "scope list" [under Item No. 15(a)(i), above] for that well during future runs of this non-statistical method; shall notify the Regional Board by phone, followed by more formal notification via fax, email, or writing within fourteen days and inclusion of a notice thereof in the facility operating record; and shall note this change prominently in the body of the forthcoming monitoring report and in that report's summary.
- c. The Discharger may propose alternative non-statistical methods for Mpars seldom found in background to be approved by the Executive Officer, together with a technical discussion showing how the proposed method performs at least as well as the one described above at achieving the goal of providing the earliest possible detection and measurement of a release for any given rarely-detected constituent at any given well.
16. Monitoring Data Information - For each Mpar addressed during a given reporting period, the Discharger shall include in the monitoring report a listing of the prevailing MDL and PQL for that Mpar, together with an indication as to whether the MDL, PQL, or both have changed since the prior reporting period. The Discharger shall require the analytical laboratory to report all applicable censored data (trace level and non-detect determinations). In the event that an MDL and/or PQL for an Mpar changes, the Discharger shall highlight that change in the report summary and the report shall include an explanation for the change that is approved by the owner/director of the analytical laboratory.
17. Data analysis shall be carried out as soon as the data are available in accordance with statistical and non-statistical analyses requirements described in this MRP.

T
E
N
T
A
T
I
V
E

SAMPLING AND ANALYTICAL PROCEDURES

18. Unless otherwise approved by the Executive Officer, all analyses shall be conducted at a laboratory certified for such analyses by the DHS. All analyses shall be conducted in accordance with the latest edition of "Test Methods for Evaluating Physical/Chemical Methods" (SW-846) promulgated by the USEPA (or equivalent standard methods as approved by the Executive Officer) and in accordance with an approved sampling and analysis plan. Water and waste analysis shall be performed by a laboratory approved for these analyses by the State of California. Specific methods of analysis must be identified. If methods other than USEPA-approved methods or standard methods are used, the exact methodology must be submitted for review and must be approved by the Executive Officer prior to use. For any analyses performed for which no procedures are specified in the EPA guidelines or in this MRP, the constituent or parameter analyzed, and the method or procedure used, must be specified in the corresponding monitoring report. The director of the laboratory whose name appears on the certification shall supervise all analytical work in his/her laboratory and shall approve all reports of such work submitted to the Regional Board. All monitoring instruments and equipment shall be properly calibrated and maintained to ensure accuracy of measurements. In addition, the Discharger is responsible for seeing that the laboratory analysis of all samples meet the following restrictions:

- a. The methods and analysis and the detection limits used must be appropriate for the expected concentrations. For detection 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 methods having the lowest facility-specific MDL shall be selected from among those methods which would provide valid results in light of any matrix effects involved.
- b. Trace results falling between the MDL and the facility-specific 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 and by an estimate of the constituent's concentration.
- c. 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. If the lab suspects that, due to 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 an estimate of the detection limit and quantitation limit actually achieved.
- d. All quality assurance/quality control (QA/QC) data shall be reported, along with the sample results to which it applies, including the preparation and analytical methods, instrument, analytical detection limits, dilution factors, units, the recovery rates, an explanation (corrective action) of any QA/QC measure that is outside the laboratory control limits, the results of 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 recovery unless otherwise specified by the reference method.

T
E
N
T
A
T
I
V
E

- e. Upon receiving written approval from the Executive Officer, an alternative statistical or non-statistical procedure can be used for determining the significance of analytical results for a constituent that is a common laboratory contaminant (i.e., methylene chloride, acetone, diethylhexyl phthalate, and di-n-octyl phthalate) during any given reporting period in which QA/QC samples show evidence of laboratory contamination for that constituent. Nevertheless, analytical results involving detection of these analytes in any sample shall be reported and flagged for easy reference by Regional Board staff.
 - f. Within 90 days of the adoption of the Order, the discharger shall submit a technical report for approval by the Executive Officer that describes the methodology for identifying and estimating concentrations for tentatively identified compounds.
 - g. In cases where contaminants are detected in QA/QC samples (i.e. field, trip, or lab blanks), the accompanying sample results shall be appropriately identified.
19. Proper chain of custody procedures shall be used in all sampling activities at the Landfill.
 20. All compliance groundwater monitoring system wells shall be equipped with dedicated sampling pumps, unless otherwise approved by the Executive Officer.
 21. All metals analyses shall be for total metals using unfiltered samples. Metals samples must be preserved in accordance with the specified laboratory method, however care shall be taken that the dissolved metals samples are not exposed to acids until after filtering. The Discharger may elect to also obtain filtered metals representative of the dissolved phase. If so the Discharger must report the results of both the filtered and unfiltered.
 22. No filtering of samples taken for organics analyses shall be permitted. Samples for organic analyses shall be taken with a sampling method that minimizes volatilization and degradation of potential constituents.
 23. Ninety-Day Sample Procurement Limitation: For any given monitored medium, the samples taken from all monitoring points to satisfy the data analysis requirements for a given reporting period shall all be taken within a span of ninety days, and shall be taken in a manner that insures sample independence to the greatest extent feasible [27 CCR section 20415(e)(12)(B)]. For any sampling event during which samples are not collected within ninety days, the Discharger shall report the sampling period in the corresponding semiannual report.
 24. Groundwater sampling shall also include an accurate determination of the groundwater surface elevation and field parameters (temperature, pH, electrical conductivity, turbidity) for that monitoring point [27 CCR section 20415(e)(13)]; groundwater elevations taken prior to purging the well and sampling for monitoring parameters shall be used to fulfill groundwater flow rate/direction analyses required under Item No. 31(a)(i) of this MRP. All field parameter measurements shall be included in the semiannual reports submitted to the Regional Board.
 25. Records to be maintained- Written reports shall be maintained by the Discharger or its laboratory and shall be retained for a minimum of five years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Board. Such records shall show the following for each sample:

T
E
N
T
A
T
I
V
E

- a. Identity of sample and of the monitoring point from which it was taken, along with the identity of the individual who obtained the sample;
- b. Date and time of sampling;
- c. Date and time that analyses were started and completed, and the name of the personnel performing each analysis;
- d. Complete procedures used, including method of preserving the sample, and the identity and volumes of reagents used;
- e. Calculations of results; and
- f. Results of analyses, and the MDL and PQL for each analysis.

REPORTS TO BE FILED WITH THE REGIONAL BOARD

26. Semi-annual and annual monitoring reports shall be submitted pursuant to the following schedule.

<u>Report</u>	<u>Period</u>	<u>Reporting Date</u>
1 st Semiannual	October - March	April 30 th
2 nd Semiannual	April – September	October 30 th
Annual	April – March	April 30 th

The Discharger may combine the annual report with the 1st semiannual report of the year provided that all required information is included in the combined report. The semiannual and annual reports shall include all information that is routinely required in the Order and this MRP.

27. All groundwater monitoring reports shall be prepared under the supervision of a California-registered professional geologist or registered civil engineer and shall be certified by the individual as meeting the prescriptive standards and/or performance goals of 27 CCR.
28. Transmittal letter - A letter transmitting the essential points shall accompany each report. Such a letter shall include a discussion of any violations found since the last such report was submitted, and shall describe actions taken or planned for correcting those violations. If the Discharger has previously submitted a detailed time schedule for correcting said violations, a reference to the correspondence transmitting such schedule will be satisfactory. If no violations have occurred since the last submittal, this shall be stated in the transmittal letter.
29. Signature, certification, and perjury statement requirements - All letters transmitting monitoring reports shall follow the signature, certification, and perjury statement requirements provided in Requirement F.7 of the Order.
30. The Discharger shall submit all scheduled reports required in the Order and this MRP electronically, in accordance with 23 CCR section 3890 et. seq., or as directed by the Regional Board Executive Officer. Until directed otherwise by the Regional Board Executive Officer, all reports shall be submitted to the State Board GeoTracker data system in searchable Portable Document Format (PDF) files (Geotracker Global ID. L10005092201). In addition, all groundwater analytical data and monitoring well locations shall be submitted

T
E
N
T
A
T
I
V
E

to GeoTracker in Electronic Deliverable Format (EDF). Documents that cannot be conveniently reviewed in electronic format, such as large maps or drawings, shall be submitted as hard copies to the Regional Board office as instructed by Regional Board staff. All hard copy reports required in this MRP shall be addressed to:

California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, California 90013
ATTN: Information Technology Unit

The program number (CI-6198) shall be clearly displayed on the cover page of each report.

31. **Semiannual monitoring reports** shall be comprised of at least the following:

- a. Compliance evaluation summary - Each report shall include a compliance evaluation summary. The summary shall contain at least:
 - i. For each monitored groundwater body, a description and graphical presentation of the velocity and direction of the groundwater flow under/around the Landfill, based upon water level elevations taken during the collection of the water quality data submitted in the report. In the case where this cannot be determined with meaningful results, a statement to the nature of the groundwater flow and general flow characteristics will suffice.
 - ii. Pre-sampling purge for samples obtained from wells: For each monitoring point addressed by the report, a description of the method and time of water level measurement, of the type of pump used for purging and the placement of the pump in the well, and of the method of purging (the pumping rate, the equipment and methods used to monitor field pH, temperature, electrical conductivity and turbidity during purging, the calibration of the field equipment, results of the pH, temperature, electrical conductivity, and turbidity testing, and the method of disposing of the purge water).
 - iii. Sampling: For each monitoring point addressed by the report, a description of the sampling procedure (number and description of the samples, field blanks, travel blanks, and duplicate samples taken, the date and time of sampling, the name of the person taking the samples, and any other observations).
 - iv. A separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the Discharger into full compliance with waste discharge requirements. This section shall be located at the front of the report and shall clearly list all noncompliance with discharge requirements.
 - v. A separate appendix containing any revised COCs List (showing its then-current Mpar List), together with, for each such listing, the wells to which that list applies. In any such listing, the new or moved COC(s) shall be in bolded print (or otherwise emphasized).

T
E
N
T
A
T
I
V
E

- vi. A separate appendix containing, for each well/COCs pair, the then-current Concentration Limit (i.e., the source of the background data and a list of the then current background data [concentrations]). (For the first report under this MRP, all background data for all well/COCs pairs listed in Tables T-1 and the "Indicator Parameters" in T-2 shall be included. In subsequent reports, only the data for recalculated Concentration Limits need be included).
- vii. A separate appendix containing, for the first submittal thereof, a complete succinct description of the data analysis method, including all parameter settings, for each well/Mpar pair. If the method is the CNSDAM, simply state "CNSDAM" following the well/Mpar pair's name, without further description. For subsequent annual monitoring reports, this appendix need address only those well/Mpar pairs for which the data analysis method has changed since the initial (comprehensive) listing, together with the date when that (most recent) change became effective.
- viii. A separate appendix listing, organized by well, listing all Mpars that are in Tracking Mode (release indicated) at each well and showing (in parentheses following the constituent name) the date when that well/Mpar pair changed from Detection Mode to Tracking Mode.
- b. A map or aerial photograph showing the locations of observation stations and monitoring points;
- c. Laboratory results for groundwater, LCRS, and any wastewater type reused at the Landfill, shall be summarized in the report. For each report, include laboratory statements of results of all analyses demonstrating compliance with Item No. 18 of this MRP;
- d. A summary and certification of completion of the routine inspections required in section ~~C.16~~-C.13 of the Order, including but not limited to, all standard observations listed below for the Landfill and the perimeter of the Landfill.
 - i. Along the perimeter of the Landfill:
 - A. Evidence of liquid leaving or entering the Landfill, estimated size of affected area, and flow rate;
 - B. Evidence of odors: presence or absence, characterization, source, and distance of travel from source; and
 - C. Evidence of erosion and/or of exposed refuse.
 - ii. For the Landfill:
 - A. Evidence of ponded water at any point on the waste management facility;
 - B. Evidence of odors: presence or absence, characterization, source, and distance of travel from source; and
 - C. Evidence of erosion and/or of exposed refuse.

T
E
N
T
A
T
I
V
E

- e. The volume of recycled water applied each month in the reporting period.
- f. A summary of any wastewater reuse including the following:
 - i. The volume of wastewater from each source in each month in the reporting period and the area(s) where the water is applied.
 - ii. A statement that, during the reporting period, all wastewater was used only as specified, and for the uses specified in the Order.
 - iii. Analytical results for wastewater. If a wastewater source was not sampled or measured during the reporting period, the reason for the omission shall be given. If no wastewater was used from a source, a statement to that effect shall be provided in lieu of analyses.
 - iv. Records of operational problems, mechanical breakdowns, and diversions to emergency storage or disposal associated with any violations, or potential violations of the Order and, any corrective actions taken.
 - v. If all or a portion of the wastewater was not used because of a failure to meet the limits specified in the Order, the report shall so state and identify the disposition of the effluent.
- g. A summary of any repair work of the final cover and any other maintenance work performed during the reporting period and plans for repair and maintenance work for the next monitoring period.
- h. A corrective actions measures (CAM) effectiveness report (per 27 CCR section 20430(h)) that includes, at a minimum, a comprehensive discussion of the compliance record and the result of any corrective actions taken, or planned, which may be needed to bring the Discharger into full compliance with the WDRs.

32. Annual monitoring reports shall contain:

- a. A graphical presentation of analytical data [27 CCR section 20415(e)(14)]: For each monitoring point, submit in graphical format the laboratory analytical data for all samples taken within at least the previous ten calendar years. Each such graph shall plot the concentration of one or more constituents over time for a given monitoring point, at a scale appropriate to show trends or variations in water quality. The graphs shall plot each datum, rather than plotting mean values. On the basis of any aberrations noted in the plotted data, the Executive Officer may direct the Discharger to carry out a preliminary investigation [27 CCR section 20080(d)(2)], the results of which will determine whether or not a release is indicated;
- b. A written summary of the groundwater analyses, indicating any changes made since the previous annual report;
- c. A discussion of any routinely-revised intra-well background monitoring data;
- d. An evaluation of the effectiveness of the run on/run -off control facilities, pursuant to 27 CCR section 21090(b)(1) and 20365.

T
E
N
T
A
T
I
V
E

33. Contingency response - Any incident at the Landfill that may endanger the environment, such as a seepage of leachate, a spill of hazardous chemicals, or discovery of a physical evidence of release as defined in 27 CCR section 20385(a)(3), shall be reported to the Regional Board pursuant to section F.4 of the Order.
34. The Discharger may submit additional data to the Regional Board not required by this program in order to simplify reporting to other regulatory agencies.
35. If the Discharger performs analyses for any parameter more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the monitoring program.

Ordered by _____

Sam Unger, P.E.
Executive Officer
November 6, 2014

**T
E
N
T
A
T
I
V
E**

**Table T-1:
Groundwater Monitoring Wells**

Location	Monitoring Wells
Compliance Wells	MW-1, MW-3, MW-7
Background Well	MW-2

**T
E
N
T
A
T
I
V
E**

Table T-2:
 Landfill COCs

Monitoring Parameters (Mpars)		Supplemental Parameters	Other COCs
Indicator Parameters*			
Inorganic Parameters: Ammonia, nitrogen Chemical oxygen demand (COD), soluble Chloride Nitrate-N Nitrite-N Sulfate Total dissolved solids (TDS) Total organic carbon (TOC) Biochemical Oxygen Demand (BOD), soluble Appendix I VOCs: 1,1,1,2-Tetrachloroethane 1,1,1-Trichloroethane 1,1,2,2-Tetrachloroethane 1,1,2-Trichloroethane 1,1-Dichloroethane 1,1-Dichloroethene 1,2,3-Trichloropropane 1,2-Dibromo-3-chloropropane 1,2-Dibromoethane 1,2-Dichlorobenzene 1,2-Dichloroethane 1,2-Dichloropropane 1,4-Dichlorobenzene 2-Butanone 2-Hexanone 4-Methyl-2-Pentanone Acetone Acrylonitrile Benzene	Bromochloromethane Bromodichloromethane Bromoform Bromomethane c-1,2-Dichloroethene c-1,3-Dichloropropene Carbon Disulfide Carbon Tetrachloride Chlorobenzene Chloroethane Chloroform Chloromethane Dibromochloromethane Dibromomethane Dichlorodifluoromethane Ethylbenzene Iodomethane Methylene chloride o-Xylene p/m-Xylene Styrene t-1,2-Dichloroethene t-1,3-Dichloropropene t-1,4-Dichloro-2-Butene Tetrachloroethene Toluene Trichloroethene Trichlorofluoromethane Vinyl Acetate Vinyl Chloride Other Organics: 1,4-Dioxane	Alkalinity, total Bicarbonate (as CaCO ₃) Boron, total Calcium, Hardness Total Organic Halogens (TOX) Field Parameters: pH Electrical conductivity Temperature Turbidity Dissolved oxygen Redox	Metals: Antimony Arsenic Barium Beryllium Cadmium Chromium, total Cobalt Copper Lead Mercury Nickel Selenium Silver Thallium Vanadium Zinc Appendix II VOCs: Any other pollutants detected and confirmed in the annual Non-COCs scan or added by the Regional Board Executive Officer

*Only indicator parameters are generally subjected to routine statistical analysis.

T
E
N
T
A
T
I
V
E

Table T-3. Threshold Values for Well/Mpar Pairs

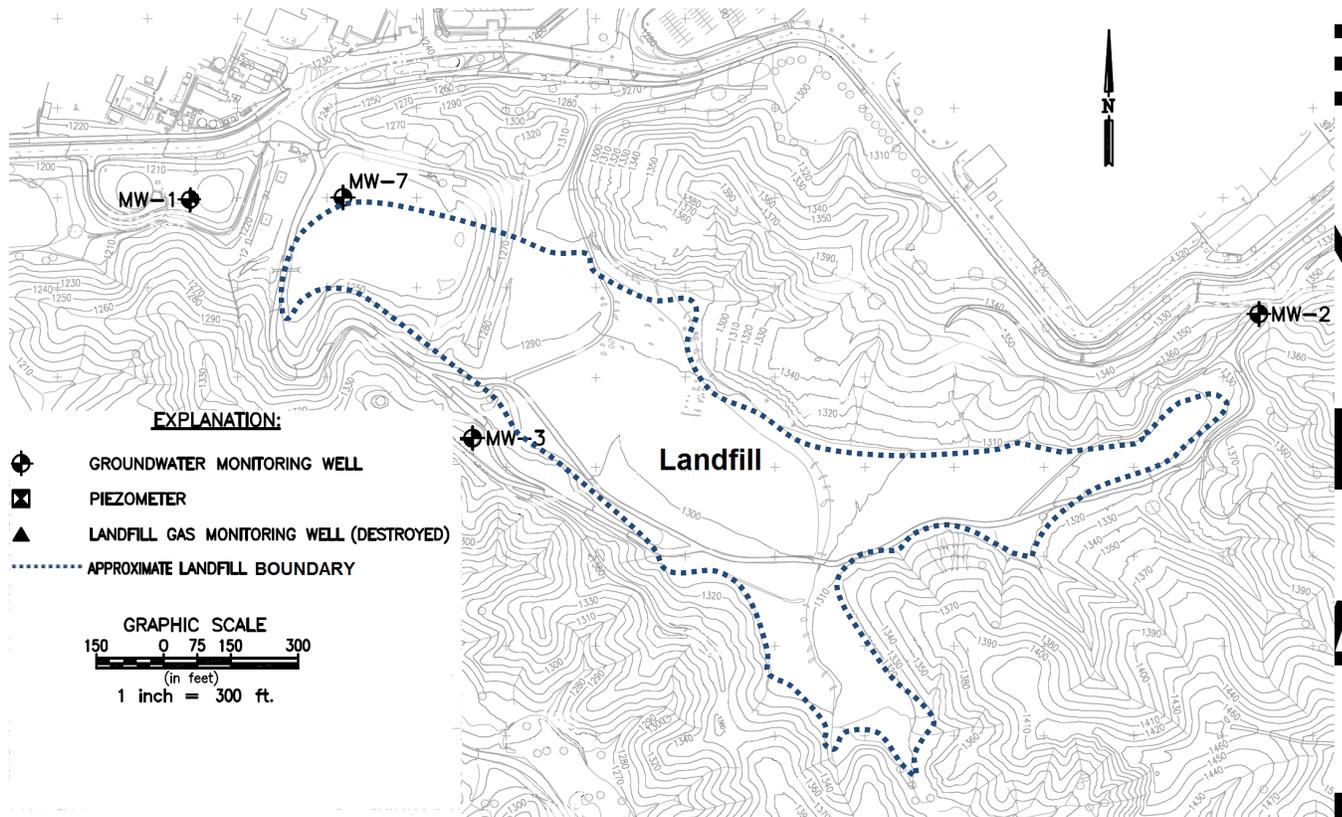
Constituent	MW-1	MW-3	MW-7
Total Dissolved Solids	1,000	1,000	1,000
Chloride	5	5	5
Sulfate	250	250	250
Ammonia Nitrogen	-	-	-
Nitrate Nitrogen	-	-	-
Biochemical Oxygen Demand	-	-	-
Chemical Oxygen Demand	-	-	-
Total Organic Carbon	-	-	-
Appendix I VOCs	Laboratory practical quantitation limits (PQLs)		

Intrawell statistical analyses using the latest 5 years of analytical data shall be used to calculate a value to populate the table and/or replace the Applicable or Relevant and Appropriate Requirements limit (ARAR) limit indicated.

Numerical values in the table are concentration limits in milligrams per liter.

T
E
N
T
A
T
I
V
E

FIGURE 1:
MONITORING WELL NETWORK



T
E
N
T
A
T
I
V
E