

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

ORDER NO. 88-54

**WASTE DISCHARGE REQUIREMENTS
FOR
IT CORPORATION
IMPERIAL VALLEY FACILITY
CLASS II WASTE MANAGEMENT UNITS
Imperial County**

The California Regional Water Quality Control Board, Colorado River Basin Region, finds that:

1. IT Corporation, (hereinafter also referred to as the discharger), 23456 Hawthorne Boulevard, Torrance, California 90505, submitted an updated Report of Waste Discharge, dated September 30, 1987.
2. The discharger's operations are contained on its privately owned 640-acre tract comprising Section 16, T13S, R12E, SBB&M. A site plan of said Section 16 is shown in Attachment A appended hereto as a part of this Order.
3. The discharger currently operates four surface impoundments (Units 3, 5, 8, and 9) in the SE $\frac{1}{4}$ of Section 16 under Board Order No. 84-111 as adopted by the Regional Board on November 14, 1984.
4. The discharger currently maintains a geothermal solids disposal unit (the Morton Solids Disposal Unit) in the NE $\frac{1}{4}$ of Section 16. It has been closed with an interim earth fill cover since 1985.
5. The five Waste Management Units (WMUs) noted above are to be closed in accordance with the requirements of this Order and are described below:

Class II Waste Management Units:

- a. WMU-3: This unit received non-oily liquid waste from 1981 to 1985. After 1985 it received only solid wastes and is being managed as a landfill. No free liquids remain in WMU-3.
- b. WMU-5: This unit received non-oily liquid waste between 1981 and January 1988 and no longer receives wastes. All free liquids will be removed prior to closure of the unit.
- c. WMU-8: This unit received non-oily liquid waste between 1980 and January 28, 1987. The unit ceased receiving waste after discovery of leakage through the eastern containment dike in January 1987. The unit will be clean closed following removal of all waste from the unit.

*Revised
1/18/94*

d. WMU-9: This unit received oily liquid waste between 1983 and 1986. It ceased receiving waste following the discovery of a fault under the unit. The unit will be clean closed following removal of all waste from the unit.

e. Morton Solids Disposal Area:

This WMU (landfill) contains only dried geothermal brine wastes which were received between July 1983 and May 1985. These wastes are classified as "Designated Waste" in accordance with Section 2522, Subchapter 15, Chapter 3, Title 23 of the California Code of Regulations. The discharger submitted a Solid Waste Assessment Test (SWAT) Report to the Regional Board about the Morton Landfill in June 1987. The Report concludes that no leakage of hazardous materials has occurred from the unit.

The five units described above are unlined units that were built on the natural clay soils at the site. The discharger reports that these clay soils have permeabilities of less than 1×10^{-6} cm/sec. The containment dikes of the units were constructed of compacted natural clay. The discharger proposes that waste materials removed from WMUs 8 and 9 either be placed into WMUs 3 and 5 for final disposal and closure or be removed to other approved waste management units either off or on site.

6. The discharger proposes to air dry the wastes in WMUs 3, 5, 8 and 9 through September 1989 in order to minimize potential leachate generation in the Units after final closure (which will take place by April 1990).
7. Surface impoundments containing hazardous wastes are subject to Article 9.5, Chapter 6.5, Division 20 of the Health and Safety Code (HSC), also known as the Toxic Pits Cleanup Act (TPCA).
8. Owners/operators of surface impoundments subject to TPCA are required to pay fees established by the State Water Resources Control Board (SWRCB), to submit a Hydrogeological Assessment Report (HAR) and to close under certain conditions. The HAR was received on November 2, 1987, and is currently under review by Regional Board staff.
9. Operators of surface impoundments that are within one-half mile upgradient from a Potential Source of Drinking Water (PSDW) are required to "cease discharge" to the said impoundments by June 30, 1988, in accordance with Section 25208.4 of the Health and Safety Code.

Discharge as defined in Section 25208.2(f) of the Health and Safety Code means "...to place, dispose of or store liquid hazardous wastes or hazardous wastes containing free liquids into or in a surface impoundment owned or operated by the person who is conducting the placing, disposal, or storage."

10. The Regional Board notified the discharger on November 4, 1987 that the surface impoundments are within one-half mile upgradient of a PSDW, and requested that a plan and time schedule for compliance with the "cease discharge" requirements be submitted by February 1, 1988.

11. The plan and time schedule for compliance with the "cease discharge" requirements have been received from the discharger. Said schedule shows that the discharger intends to "cease discharge" by June 30, 1988.
12. The five Class II WMUs described above have received wastes as categorized below. Monthly monitoring reports detailing the amount and category of wastes discharged into each WMU have been received by the Regional Board during the period of operation of the units.

The following table includes all waste categories that have been accepted into WMUs 3, 5, 8 and 9 prior to closure of the units:

| <u>Waste Type</u> | <u>California Waste Code¹</u> |
|---|--|
| <u>Inorganics</u> | |
| Alkaline solution with metals | 121 |
| Alkaline solution without metals | 122 |
| Unspecified alkaline solution | 123 |
| Aqueous solution with metals | 132 |
| Aqueous solution with total organic residues - | |
| Residues 10 percent or more | 133 |
| Residues less than 10 percent | 134 |
| Unspecified aqueous solution (includes geothermal drilling fluids and brines) | 135 |
| Other inorganic solid waste | 181 |
| <u>Organics</u> | |
| Oil/water separation sludge | 222 |
| Unspecified oil-containing waste | 223 |
| Pesticide rinse water | 231 |
| Other pesticide waste | 232 |
| Tank bottom waste | 241 |
| Polymeric resin waste | 272 |
| Latex waste | 291 |
| Biologic waste other than sewage sludge | 322 |
| Organic solids with halogens | 351 |
| Other organic solids | 352 |
| <u>Sludges</u> | |
| Unspecified sludge waste | 491 |
| <u>Miscellaneous</u> | |
| Empty pesticide containers 30 gallons or more | 511 |
| Other empty containers - 30 gallons or more | 512 |
| Less than 30 gallons | 513 |
| Drilling mud | 521 |
| Contaminated soil from site clean-ups | 611 |

1. Department of Health Services Waste Manifest Reporting Requirements (Table III), 1987.

13. The Morton Solids Disposal Unit contains approximately 350,000 tons of geothermal solids (from evaporation of geothermal brines) originally generated by a single source (i.e. Imperial Thermal Products, Inc.).
14. Manifests are utilized for hauling and disposal of all hazardous wastes, wherein the waste producer, hauler, and discharger certify compliance with State regulations by documenting their proper handling of the wastes.
15. Prior to construction operations, the site was undeveloped desert land. The area immediately adjacent to the site is also undeveloped desert land managed by the U. S. Bureau of Land Management. The nearest dwelling is a farmhouse, approximately one mile to the east. The desert land at the site consists of shallow alluvial soils, underlain by partially indurated clays, silts and silty sands. Ground water first occurs at depths of 50 to 100 feet below ground surface and has total dissolved solids concentrations that range from 1600 mg/l to 9000 mg/l. Average annual rainfall is approximately 3 inches and average annual evaporation is approximately one hundred inches. The nearest surface water, the Westside Main Canal, is located one and one half miles east of the site.
16. The main drainage channel, which approximately bisects the site, has been improved and is maintained to accommodate a projected 100-year flood from upslope areas. Disposal units are set back 100 feet from the channel banks. Perimeter drainage is provided for a 100-year flood. Drainage not in contact with waste material is being directed off site. Polluted drainage will remain on site.
17. The existing ground water detection monitoring network for the Class II Units at the site is inadequate and is being upgraded by the discharger. The discharger is scheduled to submit a proposal for a ground water and vadose zone monitoring network for the Class II Units to meet the requirements in Article 5, Subchapter 15, Chapter 3, Title 23 of the California Code of Regulations, for consideration of approval by the Regional Board's Executive Officer. The approved network will be monitored during the closure and post-closure period as required by Subchapter 15.
18. The discharger is scheduled to submit closure plans for the existing units detailing closure and post-closure operations as required by said Subchapter 15, for consideration of approval by the Regional Board's Executive Officer, which is required prior to implementation.
19. A Class I Waste Management Unit (LC-1 Landfill) is operated at the site in accordance with Waste Discharge Requirements (Order No. 85-80) adopted by the Regional Board on November 20, 1985.
20. On August 13, 1980, Imperial County Planning Department adopted Environmental Impact Report (EIR) No. 226-79 for this disposal site. Said EIR was updated on December 6, 1983 as "Final EIR for Amended CUP 457-80" (SCH #79090501(a)).

21. The Water Quality Control Plan for the Colorado River Basin Region of California was adopted by the Board on November 14, 1984.
22. The Board has notified the discharger and interested agencies and persons of its intent to update waste discharge requirements for the discharge and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.
23. The Board in a public meeting heard and considered all comments pertaining to the existing discharge.

IT IS HEREBY ORDERED, the discharger shall comply with the following:

A. Discharge Specifications

1. Neither operations nor activities at this facility shall create a pollution or a nuisance as defined in Division 7 of the California Water Code.
2. Waste materials shall not be discharged outside the designated disposal areas shown on Attachment A.
3. Disposal areas shall be protected from any washout or erosion of wastes or covering material, and from inundation, which could occur as a result of floods having a predicted frequency as set forth in the then current edition of Subchapter 15, Chapter 3, Title 23, California Code of Regulations.
4. Waste material, and any water that has contacted the waste materials, shall be contained in those areas designated for the particular wastes.
5. Waste confinement barriers shall be protected and maintained to ensure their effectiveness.
6. All site facilities shall be designed and constructed to minimize damage to the graded foundation or to the structures which control leachate, surface drainage, erosion, and gas due to the maximum credible earthquake.
7. There shall be no seepage or overflow from liquid waste holding facilities.
8. The discharger shall remove and relocate any wastes which are discharged at this site in violation of these requirements.
9. The discharger shall "cease discharge" into the surface impoundments by June 30, 1988 in accordance with Section 25208.4 of the Health and Safety Code.
10. Closure and Post-Closure Plans conforming to the then current edition of said Subchapter 15 for the five waste management units (as described in Findings 3 and 4 above), shall be submitted to the Regional Board by July 5, 1988 for approval by the Regional Board's Executive Officer prior to implementation.
11. A Ground Water and Vadose Zone Monitoring Program Proposal conforming to the then current edition of said Subchapter 15 for the five waste management

units (as described in Findings 3 and 4 above) shall be submitted to the Regional Board for approval by the Regional Board's Executive Officer prior to implementation. Said Monitoring Program shall be implemented by October 1, 1988.

B. Prohibitions

1. The discharge of any wastes to surface drainage courses or to ground waters is prohibited.
2. Waste shall not be accepted for disposal if it contains a substance which is all of the following:
 - a. A material that has toxicity upon inhalation that causes it to be toxic as defined by criteria adopted by the California Department of Health Services, or is listed in Section 66680 of Title 22 of the California Code of Regulations with an indication that it is toxic; and
 - b. A substance with a vapor pressure exceeding 1 mm mercury at 20°C; and
 - c. Present in the waste in a concentration greater than ten percent by weight.
3. Waste which conforms to the definition of extremely hazardous waste in Section 25115 of the Health and Safety Code, such as waste which contains a substance listed in Section 66685 of Title 22 of the California Code of Regulations, shall not be accepted for disposal.
4. No wastes containing free liquids shall be placed into WMUs at the site after June 30, 1988 and the WMUs described in Finding No. 3 (above) shall be operated in compliance with applicable provisions of the Toxic Pits Cleanup Act and any future revisions thereto.
5. No wastes shall be discharged into WMU 8 or WMU 9 after June 30, 1988.

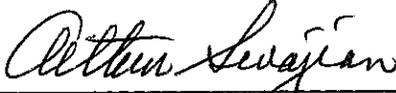
C. Provisions

1. The discharger shall maintain a copy of this Order at the site so as to be available at all times to site operating personnel.
2. The discharger shall maintain a legible record, using a reporting form approved by the Regional Board's Executive Officer, of the volume and type of each waste received at the site and the manner and location of disposal. The record shall be maintained for a period of not less than ten years, with the records to be forwarded to the Regional Board if disposal operations cease.
3. The discharger shall update the operation plan when substantial changes in operations are made; and a letter shall be submitted to the Regional Board annually indicating compliance or non-compliance with the said plan. The plan shall conform to the then current edition of said Subchapter 15.
4. The owner or operator of the disposal site shall notify the Board in writing of any change in ownership or of other persons responsible for site closure and subsequent maintenance thereof. This notification must be given at least 30 days prior to the effective date of the change.

5. The discharger shall comply with the "Monitoring and Reporting Program No. 88-54", and future revisions thereto, as specified by the Regional Board's Executive Officer.
6. This Order does not authorize violation of any federal, state, or local laws or regulations.
7. The discharger shall maintain an impermeable road surface on the Garvey Road bridge at the Westside Main Canal to prevent any materials on the bridge from entering the canal. The discharger shall maintain a surface water drainage system to prevent lateral runoff from the bridge or its approaches from entering the Westside Main Canal.

IT IS FURTHER ORDERED THAT: Board Order No. 84-111 be superseded by this Order.

I, Arthur Swajian, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Colorado River Basin Region, on JUN 30 1988.



Executive Officer

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

**MONITORING AND REPORTING PROGRAM NO. 88-54
FOR
IT CORPORATION
IMPERIAL VALLEY FACILITY
CLASS II WASTE MANAGEMENT UNITS
Imperial County**

Location of Discharge: Section 16, T13S, R12E, SBB&M.

MONITORING

IT Corporation shall report monitoring data to the Regional Board in accordance with the following schedule:

A. WASTE MONITORING

1. The following information shall be reported monthly to the Regional Board concerning each load of waste accepted at the site for disposal:
 - a. Quantity of each waste received in tons, or cubic yards.
 - b. Type of waste received classified by the general categories of wastes which have been approved for disposal at this site.
 - c. Location of disposal of the waste.
 - d. Manifest number of the waste.
 - e. Date of receipt of the waste.

B. WASTE MANAGEMENT UNIT MONITORING

1. The discharger shall inspect weekly all WMU's that have not been closed in accordance with the requirements of Order No. 88-54, and shall report the results of the inspections monthly. The report shall contain the following information:
 - a. Freeboard of each unit.
 - b. Whether any units contain free liquid.
 - c. Any apparent seepage from the units.
 - d. General condition of berms at each unit.
 - e. Steps taken to correct any problems found during inspections and date when corrections were implemented.

2. The discharger shall inspect monthly all units that have been closed in accordance with requirements of Order No. 88-54, and report the results of the inspection quarterly. The report shall contain the following information:
 - a. Condition of the closure cap at each closed unit including any effects of erosion or animal caused damage to the cap.
 - b. Any apparent seepage or gas emanation from each unit.
 - c. Steps taken to correct any problems found during inspection and date when corrections were implemented.

C. GROUND WATER AND VADOSE ZONE MONITORING

1. After Executive Officer approval is given for a Ground Water and Vadose Zone Monitoring Program for each unit or group of units, the discharger shall submit the data as required by said program.
2. The following additional information shall be reported for each sampling of ground water monitoring wells:
 - a. Date of sampling.
 - b. Date well purged prior to sampling.
 - c. Estimate of volume of water purged from each well prior to sampling.
 - d. Static water level in well prior to pumping (MSL Elevation).
 - e. Date static water level measurement taken.

D. STORM AND FLOOD PROTECTION FACILITIES

The discharger shall inspect all internal and external flood protection facilities at least quarterly and following each storm which generates any stormwater flow through the diversion channels. The results of inspection shall be reported quarterly to the Regional Board. If significant damage to the flood protection facilities are found, the discharger shall report immediately to the Regional Board by telephone and letter the following information:

1. Nature, location and extent of damage.
2. Type and quantity of wastes threatened, if any.
3. Interim measures to be taken to assure that no wastes are discharged from the facility.
4. Time schedule for repairs.

- E. The discharge of any waste other than those allowed in the specifications, or any other non-compliance with the operations plan, shall be reported to the Regional Board immediately upon the discharger becoming aware that said violation(s) occurred, along with an explanation of how the correction of said violation(s) will be accomplished expeditiously, and steps being taken to prevent a recurrence.
- F. A report shall be submitted annually summarizing progress and compliance, and including any non-compliance, with the operations plan.

REPORTING

Monitoring reports shall be submitted to the Regional Board as follows:

Monthly reports - by the 15th day of the following month.

Quarterly reports - by January 15, April 15, July 15, and October 15 of each year.

Semi-annual reports - by January 15 and July 15th of each year.

Annual reports - by January 15.

Forward monitoring reports to:

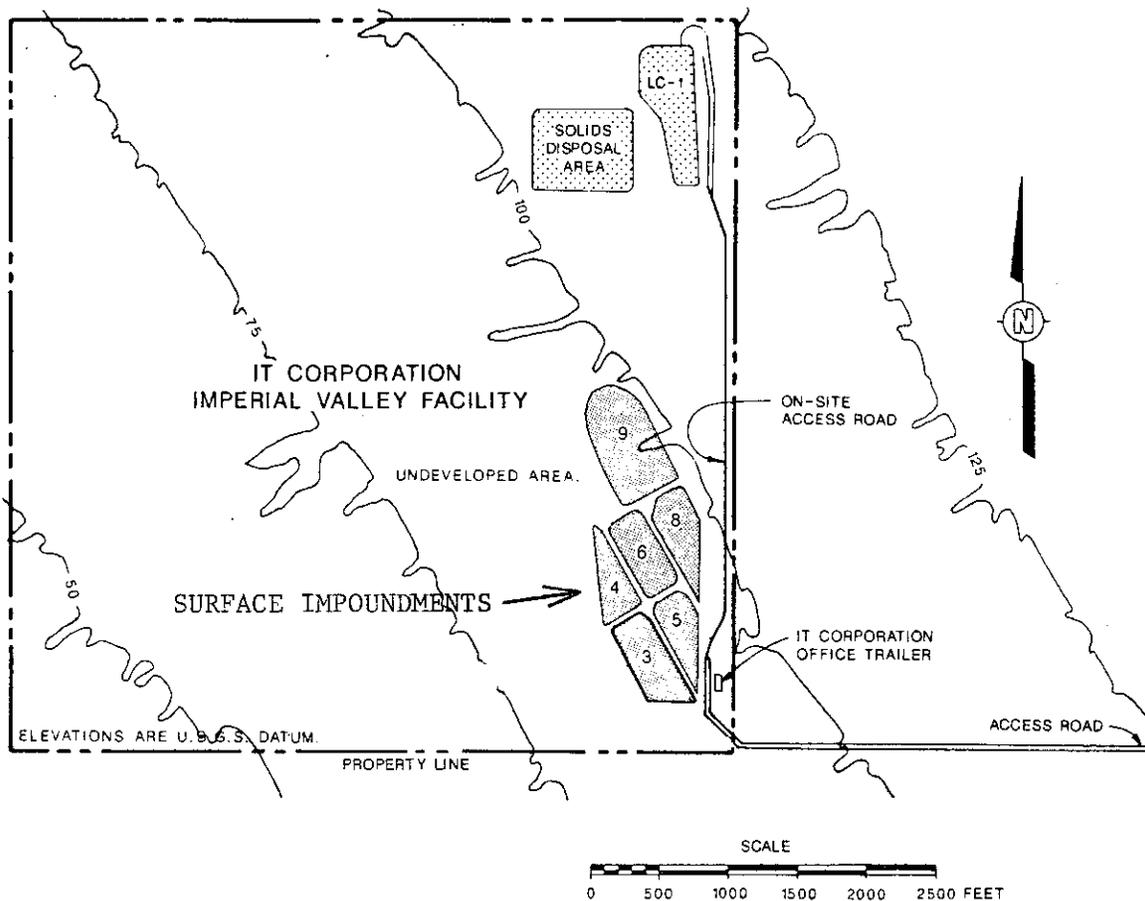
California Regional Water Quality Control Board
Colorado River Basin Region
73-271 Highway 111, Suite 21
Palm Desert, CA 92260

ORDERED BY:

Arthur Sevajian
Executive Officer
July 15, 1988
Date

ATTACHMENT A

REGIONAL WATER QUALITY CONTROL BOARD - 7



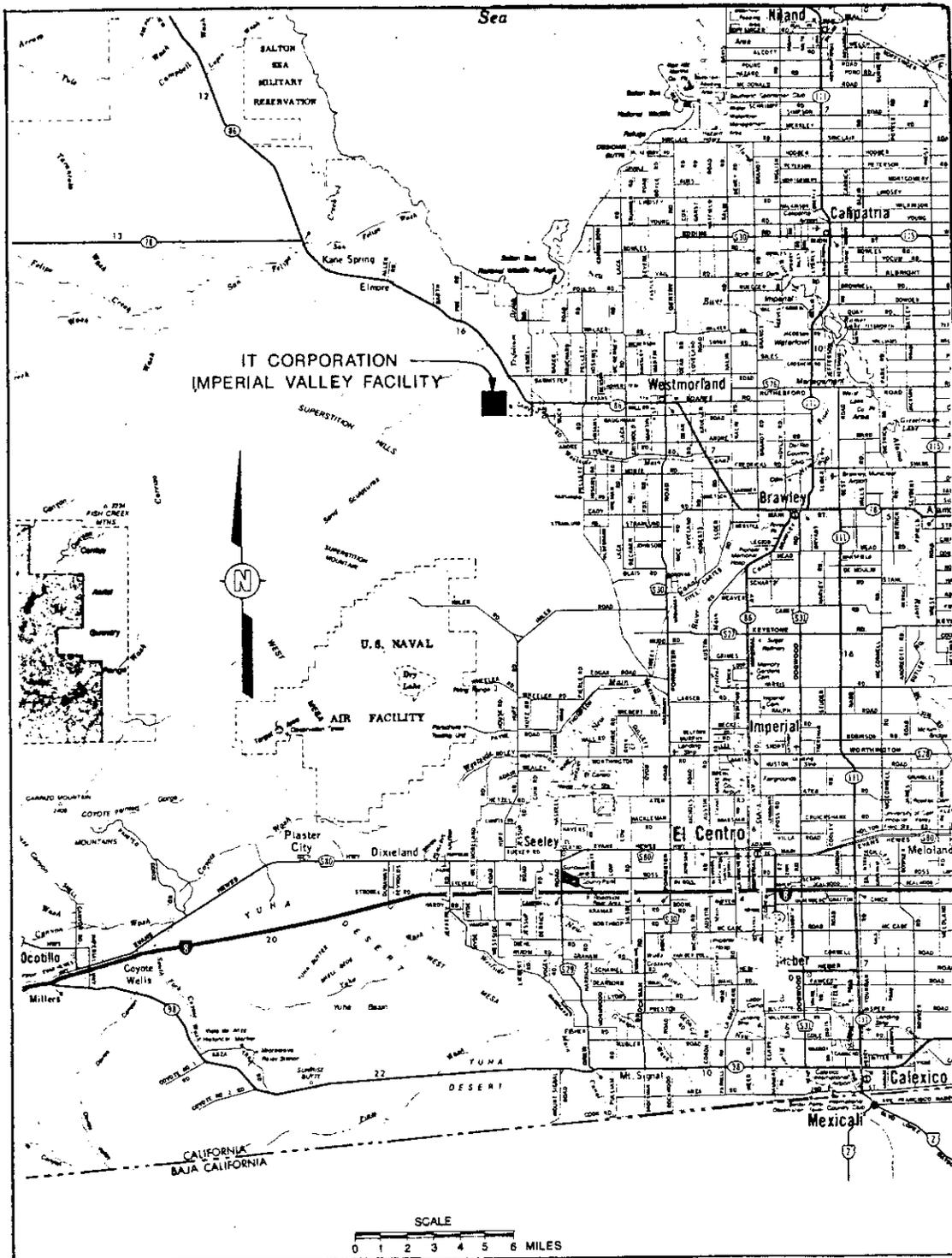
IT CORPORATION
IMPERIAL VALLEY FACILITY

(Surface Impoundments 4 and 6 are undeveloped)
(Morton Solids Disposal Unit shown as "Solids Disposal Area")

Section 16, T13S, R12E, SBB&M
West of Westmorland- Imperial County

ORDER NO. 88-54

REGIONAL WATER QUALITY CONTROL BOARD - 7



SITE LOCATION MAP

IT CORPORATION
IMPERIAL VALLEY FACILITY
Section 16, T13S, R12E, SBB&M
West of Westmorland - Imperial County