

Memorandum

To: Mike Porter, San Diego Regional Water Quality Control Board
From: Matt Moore, URS Corporation
November 3, 2009

Subject: Basin Plan Exceedances (of Water Quality Objectives) – Gregory Canyon Landfill

The purpose of this memorandum is to provide a response to the San Diego Regional Water Quality Control Board (RWQCB) regarding inquires on documentation of RWQCB water quality objectives for the proposed Gregory Canyon Landfill (GCLF).

The Construction Storm Water Pollution Prevention Plan (URS, 2008a) and Stormwater Quality Management Plan (URS, 2008b) provide information on construction and post-construction stormwater quality measures proposed for implementation of the landfill and associated bridge crossing of San Luis Rey River. Both of these documents are on file with the RWQCB. These documents provide adequate information to substantiate that the GCLF project will meet RWQCB water quality objectives in light of the RWQCB Basin Plan, State construction requirements and County of San Diego post construction storm water quality requirements.

Specifically, an initial construction SWPPP for the project was provided to the RWQCB and provides information on proposed construction related Best Management Practices (BMPs) for the project. As noted in Section 5 of the document, this initial SWPPP conforms to the required elements of the General Permit No. CAS000002 issued by the State of California, State Water Resources Control Board (SWRCB). As indicated in the SWPPP document, this SWPPP will be modified and amended to reflect any amendments to the Permit or any changes in construction or operations that may affect the discharge of pollutants from the construction site to surface waters, groundwaters, or the municipal separate storm sewer system (MS4). Construction related BMPs are identified under Section 5 of the initial SWPPP. The BMPs identified in the SWPPP provide initial selections for BMPs to be implemented on the project site to meet the requirements of construction General Permit. It is understood that that the SWRCB has a new draft construction permit that will take effect on July 1, 2010. As indicated above and in the SWPPP document, the construction activities for the project will comply with amendments or updates to the current permit. The initial construction SWPPP also provides reference to post-construction BMPs in section 5.6. Post-construction stormwater BMPs are further defined in the initial project SWMP.

The initial SWMP for the project was prepared to describe how the project will minimize the short and long-term impacts on receiving water quality including potential hydromodification impacts. The SWMP document was modeled using the framework for the County template for Stormwater Management Plan preparation at the time of document issuance. The SWMP identifies the Beneficial Uses for the receiving waters for the project (Section 3.1), anticipated pollutants of concern (Section 4) and the associated post-construction site design/low impact development BMPs (Section 6), source control (Section 7), and treatment control BMPs (Section 8) proposed for implementation to meet the San Diego County (and RWCB) post construction stormwater treatment requirements and water quality objectives of the RWQCB basin plan.

References:

URS 2008a. Storm Water Pollution Prevention Plan for Gregory Canyon Landfill, March 10, 2008. Prepared by URS Corporation.

URS 2008b. Stormwater Management Plan for Gregory Canyon Landfill, September 22, 2008. Prepared by URS Corporation.