

**STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF SEPTEMBER 23-25, 2020**

Prepared on September 1, 2020

**ITEM NUMBER:** 13

**SUBJECT:** Consideration of Proposed Order No. R3-2020-0001,  
General Waste Discharge Requirements for Active Class  
III Landfills in the Central Coast Region

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**KEY INFORMATION**

Location: Central Coast Region Jurisdictional Boundaries  
Type of Discharge: Discharge to Land  
Treatment: Disposal of Class III Nonhazardous and Municipal Solid  
Waste  
Existing Orders: See Table 1 below

**ACTION:** Adopt General Order No. R3-2020-0001

**SUMMARY**

Central Coast Water Board staff recommend adoption of the proposed General Order No. R3-2020-0001, General Waste Discharge Requirements for Active Class III Landfills in the Central Coast Region.

The Central Coast Water Board currently regulates 15 active Class III landfill facilities, which dispose of nonhazardous and municipal solid waste (MSW). To regulate these facilities, the Central Coast Water Board develops and implements individual waste discharge requirements (WDRs), and addresses stormwater with the State Water Resources Control Board's (State Water Board) Industrial Stormwater General NPDES Permit (IGP). Implementing individual WDRs over time presents challenges for incorporating the most up to date requirements and ensuring consistency across similar facilities. Furthermore, revising individual WDRs requires significant staff resources.

To improve programmatic efficiency and allow limited staff resources to focus on landfill activities with the greatest potential impact to water quality and help dischargers maintain compliance with WDR requirements, Central Coast Water Board staff recommend regulating active landfills with proposed Order No. R3-2020-0001, General

Waste Discharge Requirements for Active Class III Landfills in the Central Coast Region (General Order) rather than individual WDRs.

The proposed General Order requires landfill owners and operators (dischargers) to comply with state and federal requirements similar to the requirements included in the most recently updated existing individual WDRs for active Class III landfill facilities. The proposed General Order includes updated language and several changes that improve water quality protection and provides consistency between landfill facilities (e.g., preferential leachate pathway, lined drainages, sediment removal from drainage facilities). The proposed General Order incorporates a general monitoring and reporting program (General MRP) that includes standard requirements appropriate for all facilities. Staff will customize the General MRP for each discharger upon enrollment in the General Order to ensure landfill specific monitoring information and applicable requirements relevant to the individual facility are included in the MRP.

The proposed General Order will create up to date and consistent regulatory requirements for similar facilities, will enable Central Coast Water Board staff to focus valuable resources on review of important documents and conducting landfill facility inspections, and will provide more detailed evaluation of monitoring data to ensure landfill operations are protective of water quality. Adoption of the proposed General Order will save staff time on administrative activities that will be spent more effectively evaluating compliance with the order and assisting facilities to maintain compliance, thereby improving water quality.

## **DISCUSSION**

### **Background**

#### **What are the potential water quality impacts that may result from the disposal of nonhazardous and municipal solid waste at Class III landfill facilities?**

Class III landfill facilities operate waste management units (WMUs) approved for the disposal of nonhazardous solid waste and MSW pursuant to California Code of Regulations (CCR), title 27 and Code of Federal Regulations (CFR), part 258. Class III landfill facilities can impact groundwater and surface water from the discharge of landfill leachate, landfill gas that contacts groundwater, and contaminated stormwater. Landfill leachate is a liquid generated from existing moisture within landfill waste at the time of disposal and the percolation of water into the landfill from storm events. Leachate from Class III landfill facilities typically contains high concentrations of total dissolved solids and chemical oxygen demand, and pH can vary depending on landfill age from slightly acidic to slightly basic. Class III landfill leachate also contains volatile and semi-volatile organic compounds and may also contain heavy metals. Landfill gas is a natural byproduct of the decomposition of organic materials in Class III landfill facilities, is primarily composed of methane and carbon dioxide, and can also contain moisture and volatile organic compounds. Uncontrolled landfill gas can migrate beyond waste disposal areas to impact groundwater or surface water with volatile organic compounds. Exposed waste or leachate seeps can impact stormwater with inorganics (e.g., total

dissolved solids, minerals, metals), semi-volatile, and volatile compounds. Landfill stormwater runoff can also contain waste due to spills or wind and elevated suspended solids if erosion or sediment control best management practices are inadequate.

The potential for water quality impacts from Class III landfill facilities can be greatly reduced with proper WMU design and construction, and waste handling and disposal or diversion operations. WMUs are designed to minimize percolation of stormwater using covers, grading, and steep slopes.

### **How does the Central Coast Water Board regulate active Class III landfill facilities in the Central Coast Region?**

Central Coast Water Board staff oversee landfill facilities where waste is discharged to land. Requirements for siting, operation, and closure of waste disposal sites are implemented through the issuance of WDRs that include water quality protection requirements and monitoring. Staff evaluates compliance with WDRs and takes enforcement if necessary, to ensure adequate protection of water quality.

Historically, Central Coast Water Board staff have developed individual WDRs for each active landfill to address potential water quality impacts and to ensure compliance with state and federal regulations (e.g., Central Coast Basin Plan, CCR, title 27, and CFR, part 258). Currently, the Central Coast Water Board regulates 15 active Class III landfill facilities using individual WDRs, which are identified in Table 1 below. The individual WDRs include the landfill facility requirements for WMU design, construction, operation, closure, post-closure, corrective action, financial assurance, and monitoring. Central Coast Water Board staff work with dischargers to ensure the design, construction, and operation of WMUs is done in a manner that minimizes impacts to water quality.

**Table 1: Central Coast Region Active Class III Landfills**

<b>Landfill</b>	<b>County</b>	<b>Existing Order</b>
Lompoc Solid Waste Site	Santa Barbara	R3-2003-0014
Vandenberg Air Force Base	Santa Barbara	R3-2004-0151
City of Watsonville	Santa Cruz	R3-2006-0001
Buena Vista	Santa Cruz	R3-2006-0002
Monterey Peninsula	Monterey	R3-2006-0017
City of Santa Cruz	Santa Cruz	R3-2006-0018
City of Santa Maria	Santa Barbara	R3-2007-0045
Johnson Canyon	Monterey	R3-2008-0011
Paso Robles	San Luis Obispo	R3-2008-0050
Chicago Grade	San Luis Obispo	R3-2009-0001

Landfill	County	Existing Order
Tajiguas	Santa Barbara	R3-2010-0006
Camp Roberts South Unit	San Luis Obispo	R3-2010-0038
John Smith Road	San Benito	R3-2013-0047
Los Flores	Santa Barbara	R3-2014-0024
Cold Canyon	San Luis Obispo	R3-2015-0021

### **Why regulate active Class III landfill facilities with general WDRs rather than site specific WDRs?**

Central Coast Water Board staff continuously look to optimize our staff resources on the highest priority work and regulatory program implementation to increase efficiency and effectiveness of programs to protect water quality. Of the 15 active Class III landfill facilities in the Central Coast Region, nine have individual WDRs that are at least ten years old. In the next several years, Central Coast Water Board staff will need to evaluate and update the older WDRs to provide consistent requirements that are protective of water quality. Developing a general WDR for active Class III landfill facilities will allow Central Coast Water Board staff to improve requirements, establish consistency of requirements between landfill facilities, and focus limited staff resources on landfill oversight activities that have a greater potential to impact water quality such as new WMU design and construction, inspections, waste acceptance, monitoring and reporting, corrective actions, and closure.

Although waste disposal operations and site specifics vary both by facility and operator, all active Class III landfill facilities are required to comply with CCR, title 27 and CFR, part 258 through their individual WDRs. As individual WDRs have been updated over the years, they have become more consistent as Central Coast Water Board staff identify inconsistencies and clarify regulatory language during updates. Because of the similarities in individual WDRs and prescriptive nature of state and federal regulatory requirements, active Class III landfill facilities are well suited for general WDRs. The proposed General Order includes updated language and ensures consistent requirements for all active Class III landfill facilities in the Central Coast Region.

The proposed General Order applies to existing facilities only and is not applicable to new enrollees not specified in proposed General Order Attachment B. Central Coast Water Board staff do not anticipate new landfills in the Central Coast Region in the foreseeable future, except for the Los Flores Landfill, which is not yet operating; Los Flores Landfill has individual WDRs and is included in the proposed General Order.

The Central Coast Water Board's Land Disposal Unit has two full-time and one part-time staff assigned to manage the 15 active landfill facilities in addition to 49 closed/other landfill facilities. Closed facilities can demand as much time as some active facilities due to legacy groundwater issues associated with unlined landfill units. Land disposal staff also manage nine compost facilities that are either enrolled in the

General Compost Order or are in the enrollment process with more expected. Drafting and adopting individual landfill WDRs is a resource intensive process that requires staff to balance land disposal facility regulatory oversight with WDR development activities.

The Central Coast Water Board recognizes that discharges with similar characteristics, such as those associated with waste disposal and handling at active Class III landfill facilities in the Central Coast Region, are appropriately regulated under general WDRs. Both the Central Coast Water Board and dischargers will benefit from adoption of general WDRs as they provide regulatory uniformity and eliminate the need to update multiple individual WDRs. Obtaining coverage under general WDRs is anticipated to take approximately one month versus up to one year for individual WDRs.

The proposed General Order includes a General MRP as an example of an MRP that will be modified for each active Class III landfill facility based on site-specific characteristics and will be issued by the Executive Officer upon each discharger's enrollment in the General Order. Monitoring requirements will be more consistent between dischargers due to the use of the General MRP as a template for each active Class III landfill facility.

The proposed General Order provides more efficient permitting and allows for and requires consistent document review and feedback to dischargers. Document review is integral and required by this proposed General Order because landfill facility specific information will be included in required submittals for enrollment [primarily the Joint Technical Document (JTD)] and compliance (e.g., waste acceptance plans, WMU design, alternative daily cover, closure plans, engineered alternatives). Submitted technical documents will require Central Coast Water Board staff review and Executive Officer approval to ensure the information is accurate, enforceable, and consistent with the proposed General Order.

### **How does the proposed General Order improve water quality protection in comparison to previous individual orders?**

Historically, the Central Coast Water Board regulated active Class III landfill facilities under site specific individual WDRs. The individual WDRs require complete containment of disposed waste in a WMU as specified in CCR, title 27 and CFR, part 258. The proposed General Order maintains these requirements and includes additional requirements that are included in some of the more recent individual WDRs but not included in older individual WDRs. These requirements are summarized below.

#### Exposed Liner Protection

The proposed General Order requires dischargers to protect exposed liners from ultraviolet light, wind exposure, physical damage, and to insulate the liner system from diurnal thermal effects until operations layer or protective cover soils are placed. Damage can occur if liners are left exposed for extended periods of time, potentially resulting in leachate discharges to groundwater.

#### Operations Layer/Protective Cover Soil Placement Notification and Observation

The proposed General Order requires notification to Central Coast Water Board staff in advance of any operations layer/protective cover soils placement on top of a geomembrane liner or cover system, and observation of the operations layer/protective cover soil placement by qualified personnel. Cover soil placement observations are necessary to prevent damage to liner systems during placement of operations layer or protective cover soil as the WMU is filled. In the past, Central Coast Water Board staff found that liners are occasionally damaged and left unrepaired if operations layer or protective cover soil placement is not monitored. Damaged liner systems can result in leachate impacts to groundwater. This requirement enables Central Coast Water Board staff to observe cover soil placement in a timely manner to ensure that liner systems are not damaged.

#### Preferential Leachate Pathway

The proposed General Order requires construction of a preferential leachate pathway layer on slope(s) where new waste disposal will overlap previously disposed wastes in unlined areas that are adjacent to lined areas. Typically, preferential leachate pathways include lateral drainage layers and/or low permeable layers to promote leachate flow in a preferred direction facilitating its collection and removal. Existing individual WDRs are inconsistent in requiring a preferential leachate pathway from unlined areas to adjacent lined areas. The intent of the requirement is to reduce additional leachate generation in unlined areas while allowing for continued disposal. Preferential leachate pathways are important so that leachate generated within the overlapping waste area will flow to the leachate collection and removal system of lined portions of the WMU for collection and removal to protect water quality.

#### Lined Drainages

The proposed General Order requires dischargers to line drainage ditches crossing over WMU disposal areas that have been inactive for one year, with low permeability soils or an Executive Officer approved alternative to prevent erosion and percolation of water through waste. Lined drainages improve water quality by reducing sediment discharge and the potential for leachate seeps from the WMU to enter stormwater and reduce leachate generation within the WMU that threatens groundwater.

#### Leachate/Condensate Return

Similar to existing individual WDRs, the proposed General Order allows for the return of landfill gas condensate and leachate to lined WMUs. Returning landfill gas condensate and leachate back to the lined WMUs ensures waste constituents intended for disposal in the WMU remain in the WMU. The moisture facilitates continued breakdown or decomposition of waste reducing long-term threat and can provide a more stable landfill at closure. Returning gas condensate and leachate to WMUs can result in a reduced environmental impact by not having to transport leachate offsite to an alternative authorized disposal or treatment facility. The proposed General Order specifically requires that condensate or leachate discharge to the WMU is approved by the Executive Officer. The intent of the added requirement and allowance of leachate injection as an alternate method for handling leachate is focused on preventing potential

stormwater impacts and not transporting landfill wastes offsite. For example, during the wet weather season, implementing leachate injection instead of leachate application for dust control in lined areas would prevent stormwater contact with potential leachate pollutants on the surface of soil covers and improve stormwater quality.

#### Sediment Removal

Typically older existing individual WDRs did not specifically require removal of sediment from stormwater sediment retention basins. The proposed General Order requires accumulated sediment be removed from the stormwater retention facilities and the facilities maintain their capacity to hold stormwater to allow the appropriate amount of time for the settlement of sediment that is present in the stormwater before it discharges offsite. Due to the steep slopes and ongoing construction activities at landfills, sediment retention within drainage facilities is necessary to prevent or reduce impacts to stormwater.

#### Monitoring and Reporting

The General Order specific MRPs will include typical landfill specific monitoring requirements and additional inorganic parameters to facilitate groundwater source identification. The General Order specific MRPs will also include sediment retention basin stormwater monitoring, and more specific conditional stormwater monitoring for leachate seeps. These additional proposed monitoring requirements will improve both the discharger's and Central Coast Water Board staff's ability to identify releases from WMUs to groundwater or surface water. The MRP will include reporting requirements to ensure corrective action can be evaluated and implemented to stop the release, protect receptors and beneficial uses, and facilitate cleanup to improve water quality more effectively and in a timely manner.

#### **Compliance History**

California has regulated the landfill industry since 1972 with the adoption of the Porter Cologne Water Quality Control Act and currently all active Class III landfill facilities are required to comply with prescriptive requirements contained within CCR, title 27 and CFR, title 40, part 258. Given the significant level of regulation, Class III landfill facility owners and operators within the Central Coast Region are accustomed to being regulated by multiple agencies with differing authorities and responsibilities, and generally work proactively toward compliance. These landfill facility dischargers include city and county public agencies, private companies, the United States Department of Defense, and California Army National Guard.

Central Coast Water Board staff evaluated the compliance of active Class III landfill facility dischargers with their individual WDRs based on fee payment status, submittal of required documents (e.g., report of waste discharges, design reports, construction quality assurance (CQA) reports, wet weather preparedness reports, financial assurance estimates and funding, and preliminary and final closure plans), discharger notifications, and Central Coast Water Board staff landfill facility inspections. Overall, dischargers have complied with their individual WDRs and responded to staff information requests. Typically, Central Coast Water Board staff wet weather

inspections result in minor enforcement actions including Central Coast Water Board staff requests for information, or directives to implement corrective actions and submit follow-up documentation for waste handling, disposal, and/or drainage issues. Formal enforcement is generally limited to infrequent California Water Code section 13267 letter requests for technical reports or corrective action evaluation and have been sufficient to prompt corrective action implementation and ensure compliance with individual WDRs.

### **Proposed Enrollment Process**

Enrollment in the proposed General Order will be phased starting with landfill facilities with the oldest individual WDRs, followed by those with more recently adopted WDRs. Proposed General Order Attachment B includes a list of the landfill facilities that require coverage under this General Order and includes the dates for dischargers to submit their report of waste discharge (ROWD/JTD) and begin phased enrollment. Upon Executive Officer review and approval of the ROWD/JTD, site specific monitoring and reporting programs will be issued, and the landfill enrolled in the proposed General Order. Upon enrollment and coverage under the proposed General Order, existing individual waste discharge requirements will be terminated by the Executive Officer as specified in the proposed General Order.

### **Human Right to Water**

California Water Code, section 106.3, subdivision (a) states: It is a policy of the State of California "that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation purposes." On January 26, 2017, the Central Coast Water Board adopted Resolution No. R3-2017-0004, which affirms the realization of the human right to water and the protection of human health as the Central Coast Water Board's top priorities.

The proposed General Order is consistent with Resolution No. R3-2017-0004 by requiring waste containment at active Class III landfill facilities and ensuring design, construction, operation, closure, and monitoring of WMUs protect groundwater and surface water that serve as sources of drinking water within the Central Coast Region.

### **Disadvantaged Communities**

The Central Coast Water Board implements regulatory activities and water quality projects in a manner that ensures the fair treatment of people of all ethnicities, cultures, backgrounds, and income levels, including disadvantaged communities (DACs). Additionally, the Central Coast Water Board is committed to providing all stakeholders the opportunity to participate in the public process and provide meaningful input to decisions that affect their communities. The proposed General Order applies to all active Class III landfill facilities within the Central Coast Region. Based on 2016 census data, 8 DAC census block groups are within one mile of an active Class III landfill facility. If impacts to surface water or groundwater pollution results from the discharges regulated by the proposed order, Central Coast Water Board staff will help facilitate



outreach and education to inform affected persons and connect them with available resources, especially disadvantaged communities.

### **Climate Change**

The Central Coast faces the threat and the effects of climate change for the foreseeable and distant future. To proactively prepare and respond, Central Coast Water Board staff has launched the Central Coast Water Board's Climate Action Initiative, which identifies how our work relates to climate change and prioritizes actions that promote adaptation and mitigation to improve resilience and protect beneficial uses. The Climate Action Initiative is consistent with the Governor's Executive Order B-30-15 and the State Water Board's Climate Change Resolution No. 2017-0012.

Consistent with the Governor's Executive Order and the State Water Board's Climate Change Resolution, the Central Coast Water Board prioritizes actions that address climate change adaptation and mitigation strategies to help reduce the resulting impacts to water quality. For example, Central Coasts Water Board staff regularly consider climate change carbon impacts as a component of proposed landfill projects/activities, against the water quality benefits of prescriptive requirements. The proposed General order allows the Executive Officer to evaluate and approve engineered alternatives to prescriptive requirements.

Climate change is predicted to result in more frequent extreme weather events that may damage landfill covers and drainage facilities. The proposed General Order requires the discharger to design, construct, operate and maintain WMUs to prevent inundation or washout due to floods with a 100-year return period. In addition, dischargers are required to design, construct and maintain landfill drainages to handle 100-year, 24-hr storms and to inspect their landfill facility promptly following wet weather. Due to climate change Central Coast Water Board staff recognize that 100-year flood maps may be updated, and/or the 100-year, 24-hr storm design values may trend higher due to more frequent high intensity storms. Central Coast Water Board staff anticipate evaluating more conservative storm design requirements for critical drainage components in the Executive Officer approved JTD based on site specific drainage system performance and observations. If necessary, levees that protect landfills may need to be upgraded, and/or existing drainage facilities may need to be upgraded to handle updated 100-year, 24-hr storm design values.

Climate change is also predicted to result in more frequent and extreme wildfires and flooding, which can generate large amounts of disaster debris that requires disposal at landfills, reducing landfill capacity and lifespan. Central Coast Water Board staff anticipate dischargers will submit more frequent WMU or lateral expansion design proposals to address capacity needs.

Central Coast Water Board staff work with agencies including CalRecycle, local County Environmental Health Departments, and California Air Districts to reduce methane emissions from landfills. Methane is a greenhouse gas, which contributes significantly to climate change. Methane reduction efforts include organic waste diversion, landfill

gas control systems and monitoring, and evaluation and approval of landfill cover designs that limit methane releases. The proposed General Order allows onsite beneficial re-use of leachate rather than hauling to wastewater facilities, and encourages use of biosolids, compost, or other organic materials to establish and maintain vegetative cover on landfill slopes. The proposed General Order requires dischargers to develop a Waste Acceptance Plan for acceptance of contaminated soil or other wastes to facilitate local disposal options if appropriate and reduce transportation environmental impacts for waste disposal when possible.

## **PUBLIC PROCESS**

Central Coast Water Board staff conducted early outreach to stakeholders to inform them of the process to develop a draft General Order and obtain early input. Prior to circulating the proposed General Order for public comment, Central Coast Water Board staff circulated a “preliminary” draft General Order for review and comment by interested persons on October 30, 2019. Interested persons for this preliminary draft included dischargers and environmental groups that have historically expressed interest in landfill WDRs. Dischargers either directly, or through their consultants, provided comments on the preliminary draft General Order that resulted in minor revisions and clarifications. Central Coast Water Board staff also followed up with conference calls with many of the dischargers to discuss their comments and considered the early input received on the preliminary draft General Order in developing the draft General Order. The interested persons for the preliminary draft were notified that they would also have an opportunity to comment on the draft General Order through the formal 30-day comment period.

On June 26, 2020, Central Coast Water Board staff posted the draft General Order to the Central Coast Water Board’s website and notified Class III landfill facility dischargers, agencies, and other interested persons (e.g., consultants, environmental interest groups, environmental justice groups) of its intent to consider adoption of the proposed General Order and the opportunity to submit written comments during the 30-day public comment period. A hard copy notice was mailed to neighboring property owners on June 29, 2020. Written comments were due to the Central Coast Water Board by July 29, 2020.

Central Coast Water Board staff also conducted interagency coordination by sending the draft General Order to agencies including CalRecycle and county environmental health departments. Several of the county environmental health departments are also local enforcement agencies (LEAs) working in coordination with CalRecycle to regulate landfills with solid waste facility permits. Staff provided these agencies with a draft of the General Order to ensure that they are informed of our intent to regulate landfills with general waste discharge requirements and provide them with an opportunity to comment.

The public process to receive input during the development of the proposed General Order is discussed in more detail in the Response to Comments (Attachment 2 to the Staff Report).

**COMMENTS**

The Central Coast Water Board received comment letters or emails from the following eight individuals:

- James Wyse, President, Pacific Waste Services, Inc., City of Paso Robles Landfill Contract Operator
- Mike Rivera, Solid Waste Division Manager, City of Watsonville
- Matt Machado, Deputy CAO, Director of Public Works, County of Santa Cruz
- Patrick Mathews, General Manager/CAO, Salinas Valley Solid Waste Authority
- Kent B. Harrison, Commander, California State Guard, Director of Public Works
- Jim Throop, City Manager, City of Lompoc
- Herb Cantu, Solid Waste Manager, City of Santa Maria
- Rick Mitchell, Principal Engineering Geologist, RMC Geoscience, Inc [Comments compiled from multiple parties on behalf of Waste Connections, Inc.)

In response to comments, Central Coast Water Board staff incorporated revisions to the draft General Order resulting in the proposed General Order. The substantive comments and responses are summarized below and a Response to Comments document is included as Attachment 2 to the Staff Report documenting each individual comment and response.

**General Comment 1: Some landfill operators requested that the schedule to submit a report of waste discharge, which requires submittal of a joint technical document (JTD), be modified to coincide with their normal five-year JTD submittal schedule.**

JTDs are required as part of the proposed General Order report of waste discharge (ROWD) and enrollment process (i.e., title 27 prescribed permit application). Several landfill operators expressed concerns that they would need to update their JTDs outside of their normal five-year schedule to submit JTDs to CalRecycle and the Central Coast Water Board. Staff responded by pointing out that the proposed General Order does not require a change to the five-year JTD submittal schedule and that existing JTDs can be submitted for review as part of the proposed General Order enrollment process. JTDs should reflect current landfill operational practices and so updates should not be necessary. Any need for JTD updates, including the submission of a waste acceptance plan, can be submitted as an addendum to an existing JTD rather than a complete resubmittal of a revised JTD. Central Coast Water Board staff's intent is not to require complete revisions of existing JTDs, especially those JTDs that were submitted recently. Staff expect JTDs to be updated to reflect current landfill operational activities and should be updated as such whether the five-year submittal schedule coincides with changes or not.

**General Comment 2: Some landfill operators expressed concern about having to conduct an additional round of stormwater sampling that included expanded parameters consistent with groundwater and leachate parameters in addition to**

**regular stormwater sampling required by the Industrial General Stormwater Permit (IGP).**

Staff agree that the additional stormwater discharge sampling should be covered by the IGP. Staff revised the proposed General Order to require the sampling to occur in stormwater retention basins rather than at surface water discharge points. The intent of the requirement is to evaluate potential impacts to groundwater from discharges impacted from landfill activities.

**General Comment 3: The requirement to line drainage ditches crossing over previously disposed waste is a new requirement for some dischargers and could be expensive especially if construction quality assurance (CQA) is required.**

The lined drainage ditch requirement is new for some dischargers but has been in some site specific individual WDRs for many years. Staff included the drainage ditch liner requirement to protect surface water, groundwater, and to ensure consistency among landfill requirements. The requirement is intended to prevent stormwater from infiltrating into waste and to help prevent erosion into waste. Some dischargers were concerned that the same stringent construction quality assurance requirements would be applied for these drainage ditch liners similar to the WMU base and slope liner systems. Staff revised the General Order to clarify that drainage ditch liner construction is not required to have a rigorous CQA. A less rigorous quality assurance/quality control approach can be performed by appropriate onsite personnel and tailored to the project's scale and potential impacts.

**CONCLUSION**

In summary, staff recommend regulating active Class III landfill facilities with the proposed General Order, rather than individual WDRs. Utilizing the proposed General Order will improve water quality protection and help to ensure consistency across similar regulated facilities. Furthermore, implementing the proposed General Order will improve programmatic efficiencies allowing limited staff resources to focus on landfill activities with the greatest potential impact to water quality. The proposed General Order will facilitate Central Coast Water Board staff's review of important documents, landfill facility inspections, and more detailed evaluation of monitoring data to ensure landfills operative in a manner that is protective of water quality.

**RECOMMENDATION**

Adopt Order No. R3-2020-0001, General Waste Discharge Requirements for Active Class III Landfills in the Central Coast Region.

**ATTACHMENTS**

1. Proposed Order No. R3-2020-0001, including the following associated attachments:  
Attachment A – Monitoring and Reporting Program

Attachment B – Active Class III Landfill Table  
Attachment C – Additional Findings

2. Response to Comments