

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

MEETING OF NOVEMBER 18-19, 2020

ITEM 6
Post-Closure Waste Discharge Requirements for Inyo County Recycling and Waste Management, Keeler Sanitary Landfill, Inyo County

CHRONOLOGY	
February 11, 1973	Water Board adopted Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (MRP), Board Order No. 6-73-5, which set requirements for the operation of the Keeler Sanitary Landfill (Facility).
September 9, 1993	Board Order No. 6-93-100 revised WDRs for the Facility and required compliance with the Code of Federal Regulations, title 40, parts 257 and 258 (Subtitle D) as implemented in the State of California under State Water Resources Control Board Resolution No 93-62.
January 12, 1995	Board Order No. 6-95-06 was adopted rescinding Board Order No. 6-93-10016 because the Facility did not receive waste after October 9, 1991; as such, the Facility is exempt from Subtitle D requirements.
June 8, 1995	Board Order No. 6-73-5A1 was adopted to implement a proposed time schedule to develop a Water Quality Protection Standard and Final Closure Plan for the Facility.
September 5, 1996	Board Order No. 6-73-5A2 was adopted to amend the proposed time schedule set by Board Order No. 6-73-5A1, as the Discharger was not financially capable of meeting the time constraints.

BACKGROUND
<p>The Keeler Sanitary Landfill operated and received waste under Board Order No. 6-73-5. The Landfill stopped receiving waste in December 1987 and was closed in 2005 in accordance with a Final Closure and Post-Closure Maintenance Plan (FCPCMP) dated March 2004. Inyo County Recycling and Waste Management currently operates a waste transfer station overtop a portion of the closed Landfill. The Water Board is rescinding Board Order No. 6-73-5, and amendments, and issuing these Post-Closure WDRs and updating the Monitoring and Reporting Program (MRP) to: (1) document closure of the Facility; (2) establish the post-closure maintenance and monitoring period and requirements for the Facility; and (3) provide general updates to the WDRs and MRP based on current site conditions, in compliance with California Code of Regulations (CCR), title 27.</p>

ISSUES
Should the Water Board adopt new Post-Closure WDRs and associated MRP to establish post-closure maintenance and monitoring requirements for the Facility?

DISCUSSION

The Facility is a closed Class III solid waste landfill operated by Inyo County Recycling and Waste Management (operator) and owned by the City of Los Angeles, Department of Water and Power (landowner) since the 1940s. For the purposes of this Order, the operator and landowner are referred to as the "Discharger." The Facility consists of two, non-contiguous waste disposal cells (Site 1 and Site 2) that are unlined with no leachate collection and recovery system (LCRS): Site 1 is 0.7 acre, and Site 2 is 1.1 acres. Historically, most of the waste was burned. This Order defines the Landfill's closure date and establishes the post-closure maintenance and monitoring requirements for the Facility.

The Landfill was closed in 2005 in accordance with the FCPCMP dated March 2004. An engineered alternative final cover was constructed over the Landfill, specifically an evapotranspirative (ET) soil cover. The ET cover is a 1-foot thick monolithic cover. The main concept of an ET cover relies on the properties of soil to store water until it is either transpired through vegetation or evaporated from the soil surface to minimize percolation of water into the waste.

Since closure in 2005, the ET cover on Site 1 is maintaining native vegetation at a density similar to undisturbed adjacent lands. The waste transfer station is also located overtop a portion of Site 1 and additional soils were placed over the final cover in this area to facilitate compaction of the underlying materials as a result of the post-closure land use. Site 1 has an effective erosion-resistant vegetative layer and appears to be stable with no sign of wind or water erosion. The northern half of the ET cover on Site 2 is maintaining native vegetation at a density similar to (but slightly less than) Site 1; however, the ET cover on the southern half of Site 2 is devoid of vegetation, exhibits evidence of significant wind erosion, and is in need of repair. In February 2020, the Discharger submitted a revised FCPCMP that included a work plan to install a mechanically erosion-resistant layer overtop that portion of the ET cover of Site 2 that exhibits evidence of wind erosion pursuant to CCR, title 27, section 21090, subsection (a)(3)(A)(2). A revised work plan was later received in March 2020. The proposed mechanically erosion-resistant layer will consist of no less than 1-foot of granite cobbles ranging in diameter from 3- to 6-inches and placed directly overtop the ET cover with no additional compaction. The weight of the cobbles will act to compact the underlying cover, and the open interstices between the cobbles will trap windblown sediment, which may promote natural revegetation and help support dust mitigation efforts in the Owens Lake area. This Order will incorporate the mechanically erosion-resistant layer as part of the engineered alternative final cover for the Landfill. The Discharger will perform maintenance on an as-needed basis to maintain, as designed, the engineered alternative final cover system throughout the post-closure period of the Facility. This Order approves the FCPCMP, dated February 2020, and the engineered alternative final cover system.

The Facility stopped receiving waste in December 1987 and is, therefore, not subject to 30 years of post-closure monitoring as a requirement of the Code of Federal Regulations, title 40, parts 257 and 258 (Subtitle D). Rather, the post-closure monitoring and maintenance period for the Facility will extend until such time that the Facility no longer constitutes a potential threat to water quality pursuant to CCR, title

27, section 20950, subsection (a)(2)(A)(2). If the Discharger is engaged in a Corrective Action Program at the scheduled end of the compliance period, the compliance period shall be extended until the Discharger can demonstrate that the WMU has been in continuous compliance with its WQPS for a period of three consecutive years as specified in CCR, title 27, section 20410(c). A Detection Monitoring Program has been designed to monitor the groundwater beneath the Facility for evidence of a release from the Facility and will be implemented throughout the post-closure period of the Facility. To date, there has been no measurably significant evidence of a release at the Facility.

SUSTAINABLE GROUNDWATER MANAGEMENT ACT

The Sustainable Groundwater Management Act (SGMA) requires the formation of a Groundwater Sustainability Agency (GSA) to develop a Groundwater Sustainability Plan (GSP) for basins designated as medium to high priority at this time. The priority set by the California Department of Water Resources for the Owens Valley groundwater basin is seen in the table below. Based on this designation, neither a GSA nor GSP are required at this time.

Priority	Groundwater Basin in Inyo County
Low	Owens Valley Groundwater Basin (6-012)

Source: <https://gis.water.ca.gov/app/bp2018-dashboard/p1/>

PUBLIC OUTREACH/INPUT

The Tentative Order was distributed for public comment on September 4, 2020. Comments on the Tentative Order were received from the City of Los Angeles, Department of Water and Power; no other comments were received. Water Board staff's responses to the comments are included as Enclosure 2.

RECOMMENDATION

Adoption of Order as proposed.

ENCLOSURE	ITEM	BATES NUMBER
1	Board Order No. R6V-2020-PROPOSED	6-5
2	Comments on Tentative Order and Water Board Staff Response to Comments	6-55
3	Water Board Staff presentation	6-65