



California Regional Water Quality Control Board

Los Angeles Region



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June 10, 2004

Gary Haden, Director of Solid Waste
Ventura Regional Sanitation District
1001 Partridge Drive, Suite 150
Ventura, CA 93003-5562

Dear Mr. Haden:

REVISED DETECTION MONITORING PROGRAM - TIERRA REJADA LANDFILL, SIMI VALLEY, CA (FILE NO. 62-131)

Reference is made to your submittal of "*Technical Report, Groundwater Monitoring System Evaluation And Upgrade, Tierra Rejada Landfill*" thorough your consultant, URS. The submittal is in response to Specification C.14.d of Board Order No. R4-2002-140 which requires the permittees, collectively known as the Tierra Rejada Consortium (the Rancho Simi Recreation and Park District, Simi Valley County Sanitation District, Ventura Regional Sanitation District, and Ventura County Solid Waste Management Department) to submit a technical report, to be approved by the Executive Officer, to upgrade the current groundwater monitoring system to ensure that it can detect any water quality impacts if pollutants are released from the Landfill to groundwater. On May 17, 2004 Regional Board staff approved the following Consortium recommendations for upgrading the landfill groundwater monitoring program:

- Install two new point of compliance monitoring wells;
- Implement an intra-well monitoring program for the two new wells including an expedited data acquisition program to develop baseline water quality conditions;
- Continue monitoring existing well MW-1
- Discontinue monitoring at existing well MW-10 after base water quality at the new monitoring points has been established;
- Continue the use of existing bedrock groundwater wells for groundwater elevation measurements.

Regional Board staff believe that the proposed recommendations will allow for more effective tracking of the known release from the Landfill through an ongoing Corrective Action Monitoring program. Attached is a revised Monitoring and Reporting Program for the Landfill that reflects the proposed revisions to the monitoring program. Note that the Consortium is required to implement this amended M&RP immediately in order to maintain the existing monitoring schedule at the Landfill.

California Environmental Protection Agency

Mr. Gary Haden

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If you have any questions regarding this letter, please contact Mr. Rodney Nelson at (213) 620-6119 or Enrique Casas at (213) 620-2299.

Sincerely,



Dennis A. Dickerson
Executive Officer

Enclosure

cc: Bill Stratton, Ventura County Environmental Health Department (W/O enclosure)
John Behjan, Simi Valley County Sanitation District (W/O enclosure)
Pete Kaiser, Ventura County Solid Waste Management Department (W/O enclosure)
Frank Gonzalez, Rancho Simi Recreation and Park District (W/O enclosure)

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

**MONITORING AND REPORTING PROGRAM
CI-4294**

**TIERRA REJADA CONSORTIUM
(TIERRA REJADA LANDFILL)
(File No. 62-131)**

Monitoring and Reporting Program (M&RP) No. CI-4294 for the Tierra Rejada Landfill (Landfill) is being amended to revise the ongoing groundwater Corrective Action Program (CAP). This M&RP supersedes the August 29, 2002 monitoring provisions.

The Tierra Rejada Consortium (dischargers) shall implement this amended M&RP immediately:

A. MONITORING PROVISIONS

1. All analyses shall be performed in a laboratory certified to perform such analyses by the California Department of Health Services or a laboratory approved by the Regional Board Executive Officer (Executive Officer). Specific methods of analysis must be identified. If methods other than the United States Environmental Protection Agency (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. The director of the laboratory whose name appears on the certification shall supervise all analytical work in his/her laboratory and shall sign all reports of such work submitted to the Regional Board.
2. If the dischargers monitor any pollutants more frequently than required by Order No. R4-2002-0140, using the most recent version of USEPA Standard Methods, or as specified in Order No. R4-2002-0140, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the discharger's monitoring report. The increased frequency of monitoring shall also be reported.
3. The dischargers shall report all instances of noncompliance not reported under Reporting Requirement E.5 of Order No. R4-2002-0140 at the time monitoring reports are submitted. The reports shall contain the information listed in Reporting Requirement E.5.
4. Sample collection, storage, and analysis shall be performed according to the most recent version of Standard USEPA Methods, and in accordance with an approved sampling and analysis plan.

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5. All monitoring instruments and equipment which are used by the dischargers to fulfill the prescribed monitoring program shall be properly calibrated and maintained as necessary to ensure their continued accuracy.
6. The dischargers shall retain records of all monitoring information, including all calibration and maintenance records and copies of all reports required in Order No. R4-2002-0140. Records shall be maintained for a minimum of five 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 Executive Officer.
7. Records of monitoring information shall include:
 - a. The date, identity of sample, monitoring point from which it was taken, and time of sampling or measurement;
 - b. The individual(s) who performed the sampling or measurements;
 - c. Date and time that analyses were started and completed, and the name of the personnel performing each analysis;
 - d. The analytical techniques or method used, including method of preserving the sample and the identity and volumes of reagents used;
 - e. Calculation of results;
 - f. Results of analyses, and the method detection limit (MDL) for each parameter, and
 - g. Laboratory quality assurance results (e.g. percent recovery, response factor).
8. The monitoring reports shall be signed and certified under penalty of law by an authorized person as required by Reporting Requirement E.7 of Order No. R4-2002-0140.

B. SITE POST-CLOSURE MAINTENANCE

1. The dischargers shall perform quarterly inspections of the Landfill and report the results semi-annually. The report shall contain information on the site's condition and a discussion of any significant findings with regard to:
 - a. General site condition;

- b. Surface cover and slope;
 - c. Drainage facilities;
 - d. Groundwater monitoring networks;
 - e. Methane gas control system;
 - f. Observation of seepage from the site; and
 - g. Maintenance activities at the site.
2. If statistically-significant evidence of a release from the waste management unit is determined, the dischargers shall comply with all applicable requirements of 27 CCR § 21090 et seq. (Closure and Post-Closure Maintenance Standards for Disposal Sites and Landfills) at the Landfill.

C. GROUNDWATER MONITORING PROGRAM

Monitoring Points

1. The groundwater monitoring system at the Landfill includes four groundwater monitoring wells (MW-1, MW-10, MW-12, and MW-13).
2. Monitoring points, points of compliance, and background monitoring points for each monitored medium shall include:
 - a. For water in the uppermost aquifer the monitoring point shall be upgradient or background monitoring well MW-1.
 - b. Point of compliance monitoring points shall be monitoring wells MW-12 and MW-13.
 - c. For water in the uppermost aquifer, downgradient monitoring point MW-10 shall be sampled until the completion of the intra-well baseline data collection program, at which time monitoring of MW-10 shall be discontinued and the well abandoned.
3. Prior to pumping monitoring wells for sampling, the static water level shall be measured in each well. Additionally, the static water level in piezometers P-1, P-2, and P-3, shall be measured on a semi-annual basis.

4. Prior to sampling monitoring wells, the presence of a floating immiscible layer in all wells shall be determined at the beginning of each sampling event. This shall be done prior to any other activity which may disturb the surface of the water in a monitoring well (e.g. water level measurements). If an immiscible layer is found, the Regional Board shall be notified within 24 hours.

Sampling and Analytical Methods

5. Groundwater monitoring points MW-12 and MW-13 shall be sampled on an accelerated monthly program for a total of eight events to provide data for statistical analysis. The samples shall be analyzed for the monitoring parameters in Item No. 6 below.
6. Groundwater monitoring points MW-1, MW-10, MW-12, and MW-13 shall be sampled semiannually. Monitoring of well MW-10 will discontinue when the accelerated data collection program for wells MW-12 and MW-13 is complete. The samples shall be analyzed for the following monitoring parameters:

<u>Groundwater Monitoring Parameters</u>	<u>Units</u>
Chemical Oxygen Demand	mg/l
Total Organic Halogens	mg/l
Total Organic Carbon	mg/l
Total Dissolved Solids	mg/l
Hydroxide Alkalinity (CaCO ₃)	mg/l
Total Hardness (as CaCO ₃)	mg/l
Chloride	mg/l
Sulfate	mg/l
Boron	mg/l
Volatile Organic Compounds (VOCs)*	mg/l
Metals**	mg/l

*All peaks greater than 10% of the internal standard shall be identified and quantified for gas chromatography analyses.

** Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Cobalt, Copper, Lead, Mercury, Molybdenum, Nickel, Selenium, Silver, Thallium, Vanadium, and Zinc.

7. Once every five years the dischargers shall sample all monitoring points. The samples shall be analyzed for the following constituents of concern (COCs):

Groundwater Monitoring Parameters

Volatiles*
Semi-volatiles*
Pesticides*
PCB's*
Biological Oxygen Demand
Bicarbonate
Carbonate
Foaming Agents
Herbicides
Nitrate (as N)
Nitrite
Oil and Grease
Sulfides
Total cyanide
Total phenols
Turbidity

*All peaks greater than 10% of the internal standard shall be identified and quantified for gas chromatography analyses.

8. Statistical analysis shall be performed on monitoring points MW-12 and MW-13 using the intra-well prediction limit method to establish baseline conditions. To compile the baseline data in a timely manner, an accelerated data collection program shall be implemented in which samples are collected monthly for monitoring points MW-12 and MW-13 for a total of eight events. After which, MW-12 and MW-13 will be sampled on a semi-annual basis.
9. If a measurably significant evidence of a release from the waste management unit is determined, the dischargers shall conduct required monitoring and response programs in accordance with § 20385 of title 27 of the California Code of Regulations (27 CCR). (A detection monitoring program pursuant to 27 CCR § 20420, an evaluation monitoring program pursuant to 27 CCR § 20425, and a corrective action program pursuant to 27 CCR § 20430).
10. The dischargers shall submit a compliance evaluation summary of the groundwater data obtained. The summary shall contain a table that includes the following information:
 - a. Monitoring parameters;
 - b. Detection limit of monitoring equipment;

- c. Measured concentrations found in the current sampling event.
11. For each monitored groundwater body, the dischargers shall measure the water level in each well and determine groundwater flow rate and direction at least semi-annually, including the times of expected highest and lowest elevations of the water level for the respective groundwater body. Groundwater elevations for all monitoring points for a given groundwater body shall be measured within a period of time short enough to avoid temporal variations in groundwater flow which could preclude accurate determination of groundwater flow rate and direction.

D. REPORTS TO BE FILED WITH THE BOARD

1. All required groundwater monitoring reports shall be submitted no later than one month following the end of their respective reporting period. The reports shall be comprised of at least the following in addition to the specific contents listed for each respective report type:

a. Transmittal Letter

A letter summarizing the essential points shall be submitted with each report. The transmittal letter shall include:

- i. A discussion of any requirement violations found since the last such report was submitted and shall describe actions taken or planned for correcting the violations. If the dischargers has previously submitted a detailed time schedule for correcting said requirement 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; and
- ii. A statement certifying that, under penalty of perjury, that to the best of the signer's knowledge the report is true, complete, and correct. This statement shall be signed by an individual that meets the requirements contained in Reporting Requirement E.7 of Order No. R4-2002-0140.

b. Semi-Annual Report

The semi-annual report shall contain, but not be limited to the following:

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- i. Site maintenance outlined in Section B of this monitoring and reporting program.
- ii. Groundwater analysis and flow rate outlined in Section C of this monitoring and reporting program.
- iii. A map (or copy of an aerial photograph) showing the locations of observation stations, monitoring points, and background monitoring points.

c. Annual Summary Report

The dischargers shall submit an annual report to the Regional Board covering the previous monitoring year. The annual reporting period ends March 31.

- i. For each monitoring point, submit in graphical format the laboratory analytical data for all samples taken within at least the previous five calendar years. Each graph shall plot the concentration of the constituent over time for a given monitoring point, at a scale appropriate to show trends or variations in water quality.
- ii. A comprehensive discussion of the compliance record, and results of any corrective actions taken or planned which may be needed to bring the dischargers into full compliance with the waste discharge requirements.
- iii. A written summary of the monitoring results and monitoring system(s), indicating any changes made or observed since the previous annual report.
- iv. A topographic map at appropriate scale, showing the direction of groundwater flow at the Landfill.

E. REPORTING SCHEDULE

Required monitoring reports shall be submitted to the Regional Board in accordance with the following schedule:

<u>Report Frequency</u>	<u>Sampling Period</u>	<u>Report Due</u>
Semiannually	September	October 30
	March	April 30

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Annually

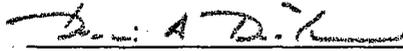
April 30

Every five years, commencing with the first monitoring period required by Order No. R4-2002-0140, the dischargers shall also submit a report concerning the direct analysis of all COCs (COC report), alternating between the Spring/Summer and Fall/Winter monitoring periods.

Monitoring reports shall be submitted to:

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

Ordered by



Dennis A. Dickerson
Executive Officer
June 10, 2004