April 5, 2019

Tracey Jue, Director,
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 W. Temple Street
Los Angeles, California 90012

CONDITIONAL APPROVAL OF FINAL CLOSURE/POST-CLOSURE MAINTENANCE PLAN AMENDMENT - PETER PITCHESS LANDFILL, SAUGUS, CALIFORNIA (FILE NO. 75-014, ORDER NO. R4-2014-0208, CI-6198, GEOTRACKER GLOBAL ID. L10005092201)

Dear Ms. Jue,

The California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board), is in receipt of your report, submitted via GeoTracker on March 15, 2019, titled *Peter J. Pitchess Detention Center Class III Landfill Final Closure/Post-Closure Maintenance Plan Amendment* (Amendment) for the Peter Pitchess (Landfill) at 29300 the Old Road, Saugus, California. The Los Angeles County Sheriff's Department (Discharger) submitted the Amendment to meet title 27 of the California Code of Regulations (Title 27), section 21090(a), which requires that landfill final covers be constructed according to identified minimum standards but allows for alternatives to the prescriptive design if the alternative isolates the wastes at least as well as would a final cover built in accordance with applicable standards.

The Landfill is an inactive municipal solid waste landfill that was operated between 1958 and 1993. The Discharger submitted a Final Closure/Post Closure Maintenance Plan (Plan) for the Landfill on April 25, 1997, which was approved by the Los Angeles County Department of Health Services (LEA) on December 17, 1998. The Plan was conditionally approved by Regional Board staff on February 10, 1999. However, the California Integrated Waste Management Board (now the California Department of Resources Recycling and Recovery, or CalRecycle) was unable to approve the Plan because closure and postclosure maintenance funding requirements had not been satisfactorily addressed. In 2003, the Discharger executed a financial resolution providing financial assurance that the Discharger could adequately fund the Landfill closure and postclosure maintenance. In January 2004, the LEA, CIWMB and Regional Water Board concurred with the Discharger's plan to evaluate an alternative final cover design to the prescriptive design included in the original Plan.

In 2007, the Discharger submitted an updated Final Closure Plan that included a water-balance final cover design for the Landfill that consists of a monolithic soil layer of at least 3-foot in thickness, with a maximum hydraulic conductivity of $1x10^{-5}$ centimeters per second. The design

also includes establishing a mature vegetative cover that is typical of the natural environment adjacent to the Landfill. The proposed final cover is designed to effectively store precipitation within the soil column for later release through evapotranspiration by an established vegetative cover and is an alternative to that prescribed in Title 27 section 21090(a)(1-3).

In 2015, the Discharger conducted additional analysis of the existing intermediate cover soils at the Landfill to refine the alternative final cover design. The analysis concluded that a 3-foot thick monolithic water balance cover, consisting of available on-site soils, would meet the requirements of Title 27 as an alternative final cover system. The proposed final cover includes areas where the existing intermediate cover soils are already a minimum of three feet in thickness and meet the soils hydraulic conductivity requirements of the final cover design. In areas with less than three feet of existing intermediate cover soils, additional soils from an on-site borrow source will be added to meet the 3-foot thick design. The proposed water balance final cover design was approved by the Regional Water Board Executive Officer with a letter dated June 30, 2016.

The recently submitted Amendment includes 90%[1] level plans and a Construction Quality Assurance (CQA) program for closure construction, focused on the final grades, cover construction, drainage and erosion controls, and a landfill gas monitoring system. Specifically, the Amendment includes a final grading plan that requires that additional cover soils be placed over the existing intermediate cover as necessary to ensure both minimum final cover thickness and adequate drainage. While not required to have the same hydraulic conductivity as the final cover, soil used in the grading fill will come from the on-site borrow source and will be placed as an engineered fill pursuant to CQA program specifications. In addition, historic field investigations have delineated areas of existing intermediate cover that exceeds the thickness of the proposed final cover design. In these areas, the thick intermediate cover is proposed to be thinned and the soil will be used as grading fill in other portions of the Landfill. However, the Plan does not include a map to display areas where the intermediate cover will be thinned for grading purposes that can be compared to the existing intermediate cover map to confirm the final cover design thickness can be achieved over the entire waste mass footprint.

Regional Water Board staff has reviewed and herein approves the Amendment, conditioned on the Discharger including in the final CQA / as-built report assurance that the grading plan achieved the final cover design thickness over the entire waste mass footprint.

If you have any questions or need additional information, please contact Dr. Enrique Casas at (213) 620-2299 or enrique.casas@waterboards.ca.gov, or Dr. Wen Yang (Chief of Land Disposal Unit) at (213) 620-2253 or wen.yang@waterboards.ca.gov.

Sincerely,

Deborah J. Smith
Executive Officer

cc: Ms. Dorcas Hanson-Lugo, Los Angeles County Environmental Health Division

[1] The 90% submittal is a complete document suitable for final review by the regulatory agencies and for solicitation of bids by the Discharger.