

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD,  
LOS ANGELES REGION

Metropolitan Water District of Southern California  
700 North Alameda Street, Los Angeles, California

October 7, 2004  
478<sup>th</sup> Regular Meeting

ITEM: 12

SUBJECT: WASTE DISCHARGE REQUIREMENTS (NON-NPDES REQUIREMENTS) - For Post-Closure Maintenance of Inactive Paramount Landfill, Long Beach, CA.

BACKGROUND/  
ISSUES

There are a large number (in excess of 700) solid waste disposal sites in the Los Angeles Region of which the vast majority are classified in title 27 of the California Code of Regulations (27 CCR) closed, abandoned or inactive ("CAI" units) because they ceased accepting waste prior to November 27, 1984 when there was a major revision to the state's landfill regulations. In heavily developed Southern California, as open land has become more scarce and expensive, there has been an increasing interest in developing CAI sites. Historically, CAI sites have tended to be relatively remote and not have postclosure land uses that posed an immediate environmental threat. As these sites are proposed to be redeveloped, changes in site conditions must to assessed to assure that no environmental threat is exacerbated by the change in land use. With increased redevelopment in the Los Angeles Region, Regional Board staff is increasingly being requested to evaluate groundwater monitoring and post-closure maintenance requirements for these CAI landfills. These circumstances created the need for an expedited system for processing the numerous requests for implementing groundwater monitoring and post-closure maintenance requirements for these CAI landfills so that on January 24, 2002, the Regional Board adopted general Order No. R4-2002-022 (Waste Discharge Requirements for Post-Closure Maintenance of Inactive Nonhazardous Waste Landfills within the Los Angeles Region). The general order established postclosure maintenance activities to be conducted at enrolled CAI landfills to maintain the integrity of containment features, such as, final covers, drainage systems, final grades, and landfill gas systems to name a few, as well as to monitor compliance through a groundwater monitoring and reporting program. On October 31, 2002, the Paramount Landfill (Landfill) was enrolled into general Order No. R4-2002-022 in order to facilitate the

development of a vacant parcel of the Landfill into active recreation park.

ISSUE(S):

General Order No. R4-2002-022 makes a distinction for CAI landfills between burn dumps and non-burn dumps because of difference in the amount of decomposable wastes, and thus the potential for being an environmental threat. Because old “cut and cover” landfills, such as the Paramount Landfill, contain biodegradable organic material and pose a greater environmental threat, general Order No. R4-2002-022 requires completion of a Solid Waste Assessment Test (SWAT) to assess whether these sites have impacted groundwater quality. If groundwater contamination is determined, a semi-annual groundwater monitoring program is required for the site with monitoring requirements that are consistent with those adopted for other landfills within the Region. Similarly, regular postclosure maintenance monitoring and reporting are required of site owners. Because of the potential impact to groundwater quality, from leaking inactive landfills, for the purposes of general Order No. R4-2002-022, the Regional Board considers such landfills as a category “1” threat to water quality, in accordance with Title 23, section 2200. As former Class II or Class III waste management facilities, the inactive landfills subject to this Order are assigned a complexity ranking of category “B”.

The City of Long Beach (Discharger) has completed a SWAT analysis for the Landfill (see Compliance History) that indicated no impact from the Landfill to local groundwater. Nonetheless, because of the on-going development of the landfill parcel into an active recreation park, groundwater monitoring is continuing. Based on the SWAT monitoring results for the Landfill, on March 3, 2004 the Discharger requested site-specific WDRs for the vacant parcel, to pursue development as an active recreation park, under revised threat to water quality and complexity ratings. Specification A.3 of Regional Board Order R4-2002-022 allows for a discharger to apply for and obtain individual waste discharge requirements (WDRs) with more specific requirements. Based on the age of refuse at the Landfill and recent groundwater monitoring results, a threat to water quality and complexity rating of 3-B is appropriate.

DISCUSSION:

Nonhazardous solid waste landfills have been regulated by the State Water Resources Control Board and the Regional Boards since the 1960' s through the issuance of WDRs. The applicable regulations

governing landfills in California, Division 3, Chapter 15 (Discharges of Waste to Land) of Title 23, California Code of Regulations (23 CCR), are now contained in California Code of Regulations Title 27 (27 CCR). Pursuant to 27 CCR Section 20080(g), landfills that are closed, abandoned, or inactive on the effective date of these regulations (November 1984) are not specifically required to be closed in accordance with Article 8 requirements of 27 CCR Section 20950. However, these landfills are subject to post-closure maintenance requirements in accordance with 27 CCR Section 20080(g).

The postclosure maintenance and groundwater monitoring requirements adopted in general Order No. R4-2002-022 and incorporated into the proposed WDRs are comparable to others adopted previously for solid waste dischargers. The WDRs, as they are met, are in conformance with the goals of this Board's Water Quality Control Plan.

COMPLIANCE

See attached.

DISCHARGE  
REQUIREMENTS/  
MONITORING COSTS:

Discharge requirements are consistent with those adopted for other landfills within the Region.

COMMENTS  
RECEIVED:

No comments received.

RECOMMENDATION: The tentative Order be adopted.

ATTACHMENTS:

Compliance History  
Discharge Requirements / Monitoring Program Cost Summary  
Tentative Waste Discharge Requirements  
Standard Provisions Applicable to Waste Discharge Requirements  
Tentative Monitoring and Reporting Program  
Comments Received  
Response to Comments  
Regional Board General Order No. R4-2002-022