

**San Diego Regional Water Quality Control Board**

July 11, 2016

**Certified Mail- Return Receipt Requested**  
**7011 0470 0002 8952 6604**

Mr. Neil Mohr  
Republic Services  
8514 Mast Blvd  
San Diego, CA 92071

**In reply refer to:**  
**246288:ACali**

**Subject: Notice of Violation and Investigative Order No. R9-2016-0067, Otay Landfill, San Diego County**

Mr. Mohr:

Enclosed is Notice of Violation (NOV) and Investigative Order No. R9-2016-0067 issued to Republic Services for violations of:

- Order No. 90-09, *Waste Discharge Requirements the for Otay Annex Landfill, San Diego Landfill Systems, Allied Waste Inc., San Diego County, and*
- Order No. 2014-0067-DWQ, *General Permit for Storm Water Discharges Associated with Industrial Activities.*
- California Code of Regulations title 27, section 20365(f).

As described in the NOV, the violations are subject to further enforcement pursuant to the Water Code. Additionally, the Investigative Order directs Republic Services to submit technical reports and a work plan under authority of Water Code section 13267.

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) reserves the right to take any further enforcement action authorized by law. To avoid further enforcement, please submit the required reports by the deadline outlined in the Investigative Order and correct the conditions that caused the violations of Orders Nos. 90-09 and 2014-0057-DWQ. The next monitoring report required to be submitted is the April-June 2016 monitoring report, which is due July 30, 2016.

**Comments on Self-Monitoring Reports**

Following are comments on the most recent self-monitoring reports:

1. Order No. R9-2001-0103

The past two Semi-Annual Monitoring Reports have cited Order No. R9-2001-0103 which was never adopted by the San Diego Water Board. Orders Nos. 90-09 and 93-86 (and addenda thereto) contain the waste discharge requirements that are in effect and applicable to the Otay Landfill. Order No. R9-2001-0103 was mistakenly posted to the San Diego Water Board's website as a draft tentative order, and has been taken down. Please refrain from citing Order No. R9-2001-0103 in future reports.

2. Data Formatting

For future monitoring reports please format data with the most recent data presented first followed by the historical data or the most recent monitoring period compared with historical average concentrations. Using this format will help to expedite the report review by the San Diego Water Board staff.

3. Request for Clarifying Information

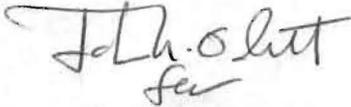
Provide a narrative explanation or rationale for why the Discharger no longer collects groundwater samples for chemical analysis from wells OTGW-9 and OTGW-21. While concentrations of constituents were not reported for the two wells on GeoTracker, the groundwater elevations for each are reported on GeoTracker.

An appendix with information about the construction details of the landfill gas extraction wells identified in the site plot plans, including elevation of surface completion, depth to top of screened interval, total depth of well, and depth of pump installation if the well is equipped with a liquid extraction system.

Please submit all future responses to the San Diego Water Board by email. Email submittals must include a signed transmittal letter (with the facility name, facility contact information, and reference code: **246288:ACali**), and be sent via email to [sandiego@waterboard.ca.gov](mailto:sandiego@waterboard.ca.gov). Information required by this NOV should be mailed to [sandiego@waterboards.ca.gov](mailto:sandiego@waterboards.ca.gov). Routine email correspondence, however, may be sent to individual San Diego Water Board staff members.

If you have any specific questions about email submittals procedures, please contact Ms. Cleo Munoz of our Mission Support Services Unit at 619-521-3384 or via email at [cleo.munoz@waterboard.ca.gov](mailto:cleo.munoz@waterboard.ca.gov). Questions concerning the NOV should be directed to Mr. Alex Cali at 619-521-3355, or via email at [Alex.Cali@waterboards.ca.gov](mailto:Alex.Cali@waterboards.ca.gov).

Sincerely,



Julie Chan, P.G, Chief  
Groundwater Protection Branch

JAC:jro:ac

- Enclosures:
- 1) NOV and Investigative Order No. R9-2016-0067 for Otay Landfill
  - 2) Otay Landfill Inspection Report
  - 3) Otay Landfill Inspection Photographs

Tech Staff Info & Use	
Order No.	90-009, 93-86
Party ID	1302
Reg. Measure ID	131120, 213828
NOV Reg Measure ID	404725
Violations ID	1003299, 1003301, 1003303
Place ID	246288

**NOTICE OF VIOLATION AND  
INVESTIGATION ORDER  
No. R9-2016-0067**

Mr. Neil Mohr  
Republic Services  
8514 Mast Blvd  
Santee, CA 92071

**Violations of Orders Nos. 90-09,  
2014-0057-DWQ, and  
Title 27, California Code of  
Regulations**

**July 11, 2016**

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Republic Services, owner and operator of the Otay Landfill, (hereinafter the Discharger) is hereby notified that the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) reserves the right to take any enforcement action authorized by law for the violations described herein.

During an inspection, San Diego Water Board staff observed numerous violations associated with site maintenance, erosion, and storm water management (see attached Inspection Report and associated photographs).

The Discharger is in violation of Orders Nos. 90-09, *Waste Discharge Requirements for the Otay Annex Landfill, San Diego Landfill Systems – Allied Waste Inc., San Diego County* and 2014-0057-DWQ, *General Permit for Storm Water Discharges Associated with Industrial Activities* (IGP); and title 27, California Code of Regulations (Cal. Code Regs.).

**A. Summary of Violations**

**1. Failure to Implement Erosion Control Measures and Best Management Practices**

Failure to implement appropriate erosion control measures constitutes a violation of Order No. 90-09, section B.15, IGP sections X.H.1.b and X.H.1.e, and title 27, Cal. Code Regs., section 20365(f). Order No. 90-09 requires the Discharger to implement erosion control measures, and complete any necessary construction, site maintenance, or repairs to those measures prior to the start of the rainy season. The implementation and maintenance of control measures is necessary to adequately protect the site from erosion, ponding, and infiltration, and to prevent surface water from coming into contact with wastes. As observed during the February 4, 2016 inspection, the southern side slopes did not have adequate vegetation to prevent erosion, and did not have erosion control BMPs (Figures 21, 22 and 23).

The IGP requires the Discharger to implement BMPs that provide effective soil stabilization for inactive areas, finished slopes, and other erodible areas; and, BMPs that sufficiently control erodible materials from discharging off the site. During the November 13, 2014 and February 4, 2016 inspections, San Diego Water Board staff observed that BMPs had not been constructed or installed at Otay Landfill to prevent erosion and to control sediment discharges.

Title 27 requires the Discharger to design, construct and maintain diversion and drainage facilities to prevent surface erosion and resist erosion from a design storm specified as a 100-year 24-hour precipitation event. During the February 4, 2016 inspection, staff observed that the southern side slopes had been eroded by the storm events that had occurred.

## **2. Failure to Properly Maintain Erosion Control Best Management Practices**

Failure to properly maintain the Site constitutes a violation of Order No. 90-09 Provision C.5, and IGP sections X.H.1 and X.H.1.e. Order No. 90-09 requires the Discharger to properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Discharger to achieve compliance with the conditions of this Order. These include all storm water and surface water control systems used to prevent run-on and runoff, and to maintain positive drainage away from wastes, and all erosion control measures. During the November 13, 2014 and February 4, 2016 inspections, staff observed that the Discharger had failed to maintain best management practices (BMPs) to control or prevent erosion (Figures 4, 5 and 9).

The IGP requires the Discharger to establish procedures for prompt maintenance and repair of systems. According to Section G.1.b of the Storm Water Pollution Plan (SWPPP) for the Landfill, monthly, pre/post-storm and National Pollutant Discharge Elimination System (NPDES) site inspections are conducted to identify problems and/or needed improvements, and areas of concern are corrected in orderly and timely manners. During the February 4, 2016 inspection, which occurred several weeks after a series of significant storm events, staff observed that problems with erosion and sediment control BMPs were not corrected at the Landfill.

## **3. Condition of the East Storm Water Basin**

The IGP prohibits discharges of liquids or other materials, other than storm water, either directly or indirectly to waters of the United States. The East Storm Water Basin has the potential to discharge waste to waters of the United States that could cause or threaten to cause pollution, contamination, or nuisance as defined in section 13050 of the Water Code. During the February 4, 2016 inspection, staff observed leachate runoff from the up gradient composting, and chip and grinding operations in the East Storm Water Basin (Figures 13, 14, 15 and 16). Rainfall after coming into contact with compost piles constitutes a waste

stream or wastewater and therefore cannot be comingled in a storm water basin. The wastewater from the working surface must be conveyed to a detention pond. The wastewater may be reapplied to the compost piles as needed. If the wastewater stored in the East Storm Water Basin were to be discharged offsite into the Municipal Separate Storm Sewer Systems (MS4s) or surface waters; then the discharge would be in violation of IGP, sections III.B-III.D, and Order No. R9-2014-0041 – Waiver No. 5, Discharges of Waste to Land at Composting Facilities.

## B. Summary of Potential Enforcement Options

The violations cited above may subject the Discharger to additional enforcement by the San Diego Water Board. Water Code section 13350 provides that any person who intentionally or negligently violates any WDRs issued or amended by the San Diego Water Board, is subject to administrative civil liability of not less than \$100 per day of the violation if no discharge occurs. The San Diego Water Board may also administer any of the following enforcement actions:

Other Potential Enforcement Actions	Applicable Water Code Section
Technical or Investigative Order	Sections 13267 or 13383
Cleanup and Abatement Order	Section 13304
Cease and Desist Order	Sections 13301 – 13303
Time Schedule Order	Sections 13300, 13308
Administer Civil Liability	Sections 13265, 13323

In addition, the San Diego Water Board may refer the matter to other resource agencies, refer the matter to the State Attorney General for injunctive relief, or refer the matter to the municipal or District Attorney for criminal prosecution.

Based on the proceeding summary of violations, the Discharger must:

1. Implement effective BMPs and storm water control systems to prevent erosion, manage and direct surface water flows, promote positive drainage, and prevent ponding, washout, and infiltration of surface water into wastes during the rainy season.
2. Implement effective stabilization for inactive areas, finished slopes, and other erodible areas prior to the next storm event.
3. Implement effective perimeter controls and stabilize all site entrances and exits to sufficiently control discharges of sediment from discharging offsite.
4. Implement measures to divert storm water run-on and runoff generated from within the landfill footprint, away from all erodible materials.
5. Implement measures to prevent leachate or wastewater runoff from the composting working surface from discharging into the East Storm Water Basin.

Leachate or wastewater runoff from the composting working surface must be conveyed to a detention pond. The leachate or wastewater can be reapplied to the compost piles as needed.

6. Implement any and all corrective actions necessary to address the violations cited above to achieve compliance with Order No. 90-09 and the IGP.
7. Update the SWPPP to include a detailed description of BMPs implemented at the landfill for storm water management. The SWPPP should also include a copy of any/all inspections completed during the past year by the County of San Diego Department of Environmental Health Local Enforcement Agency (LEA), and the San Diego Water Board.
8. Water from the East Storm Water Basin can only be discharged if it is solely comprised of storm water and BMPs are implemented in accordance with section X.H of the IGP that meet BAT/BCT. Sampling prior to discharge of solely storm water from the East Storm Water Basin must be conducted in accordance with IGP for the parameters identified in for sections V.B, XI.B, Tables 1 and 2, and Attachment F of the IGP in addition to pollutants identified for the facility in accordance with sections X.F and X.G. Republic Services should contact our Storm Water Unit Supervisor, Ms. Laurie Walsh by telephone at 619-521-3373 or email at [lwalsh@waterboards.ca.gov](mailto:lwalsh@waterboards.ca.gov), to discuss alternatives for resolving any violation(s) of the Industrial Storm Water Permit. Actions taken or results of further analyses collected to resolve those storm water violations shall be reported in in the **Storm Water, Erosion Controls, and BMP Implementation Report** required below.

### C. Leachate Generation

Leachate production is significantly elevated at the landfill relative to other municipal landfills located in the San Diego Region. In a meeting on March 29, 2016, Mr. Anthony Torres and Mr. Ricardo Serrano of the LEA informed the San Diego Water Board that:

- Leachate production has significantly increased since 2011, and may currently be as high as 1 million gallons per month at the Otay Landfill.
- Leachate levels have risen in the waste fill along the southeast sideslope of Canyon 3 to an elevation where soil gas extraction wells are adversely affected by liquid levels and have been converted into leachate/liquid recovery wells<sup>1</sup> within the waste fill (Enclosure 1 – plot plan southeastern corner of Otay Landfill).

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<sup>1</sup> According to the County LEA staff, Blackhawk systems are reportedly collecting up to 1,700 gallons per month from Blackhawk systems installed at the Otay Landfill.

- Landfill gas measurements at the surface along the interface of the liner system, near the southeast corner of Canyon 3 have been elevated prompting Republic Services to take corrective actions to control emissions of landfill gas in that area.
- There is a new community development (Otay Village I and II) located outside the east and southern perimeter boundary of the Otay Landfill.
- The County LEA reportedly received odor complaints (2015 and 2016) associated with disposal of wastes and landfill gas mitigation measures at Otay Landfill.

In an email dated April 5, 2016 the LEA advised the San Diego Water Board that:

- The LEA met with Republic Services to discuss the removal and relocation of perimeter soil vapor probes GP-5R and SVE-18D.
- The reason for removal and relocation of the landfill gas probes was their location within an easement controlled by Baldwin Home-Fed, the Developer for Otay Villages I and II, a residential development located outside the southeast perimeter of the Canyon 3 Unit at the Otay Landfill.
- The Developer reportedly plans to further develop Heritage Road by cutting and grading the basal area of the slope supporting the southeast waste fill slope located along the southeast perimeter of the Canyon 3 area of Otay Landfill (Enclosure 2 – extent of planned grading and removal of soil vapor probes GP-5R and SVE-18D).

The southeast area of the landfill (unit) appears to be accumulating leachate and liquid wastes, rather than effectively conveying those liquid wastes to the LCRS in Canyon 3 Unit. The accumulation of leachate and liquid, and increase in landfill gas in the affected area of the landfill has the potential to impair the integrity of the waste containment features<sup>2</sup> and the stability of the slopes in the affected areas of the Otay Landfill. Baldwin Home-Fed's plan to cut and grade the basal area of the slope supporting this area adds to the San Diego Water Board's concern about the stability of the waste containment features and the slope in the affected area. Information regarding the history of landfill leachate production, landfill gas production, and leachate impacts to the stability of the waste fill at the Otay Landfill is needed to understand the threat to water quality posed by the volume of leachate in the waste fill.

**D. Investigative Order. Pursuant to Water Code section 13267, the Discharger shall provide the San Diego Water Board with the following Reports;**

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<sup>2</sup> Which may create conditions in violation of title 27, Cal. Code Regs., section 20200(b)(1).

1. STORM WATER, EROSION CONTROLS AND BMP IMPLEMENTATION REPORT. This report shall include the following:

- a. Written descriptions and photographs documenting the complete installation of BMPs and erosion controls, and any corrective actions necessary to achieve compliance with Order No. 90-09 and applicable regulations, documenting all activities associated with the actions listed above.
- b. The dates of activities, a detailed description of activities undertaken and control measures implemented, and photographs to document the activities completed in response to this Order.
- c. Actions taken or analytical results of water samples collected to resolve violations of the Industrial General Storm Water Permit.

The Erosion Controls and BMP Implementation Report must be received by the San Diego Water Board no later than **5:00 pm on October 1, 2016**.

2. LEACHATE GENERATION REPORT. This report shall include the following:

- a. Documentation for the moisture content, percent solids and the annual amounts (in tons) of the following waste streams.
  - i. Dewatered sludge and grit wastes that were accepted for disposal at the Otay Landfill between 1997 and 2016. Provide documentation for waste characterization data<sup>3</sup> used to determine compliance with moisture content for acceptance of dewatered sewage sludge requirements of title 27, Cal. Code Regs., section 20220(c).
  - ii. Treated dredge sediments from the San Diego Bay Shipyard Sediment Site.
  - iii. A narrative description of the waste stream(s), and the acceptance criteria used for the waste stream(s) described in items 1.a and 1.b above (e.g., percent moisture, solids-to-liquid ratio).
  - iv. A narrative description of waste stream(s) and acceptance criteria (e.g., percent moisture, solids-to-liquid ratio) used to assess the acceptance of any other likely high moisture solids or semi-solids (less than 50 percent solids) or liquid waste streams accepted for disposal at the Otay Landfill.

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<sup>3</sup> Title 27, Cal. Code Regs., section 20220(c) states "Dischargers shall be responsible for accurate characterization of wastes, including determinations of whether or not wastes will be compatible with containment features and other wastes at a Unit under section 20220(b), and whether or not wastes are required to be managed as hazardous wastes under Chapter 11 of Division 4.5 of Title 22 of this code."

- b. Table and Graph of Leachate Generation. A tabulated list of annual total volumes of leachate collected from the Otay Landfill from 2003 to 2016. The Report shall include a graph/histogram of annual total volumes of leachate (in gallons) collected from the leachate collection and removal system (LCRS) versus time from January 1, 1998 to the present. The written analysis should include a narrative evaluation of the leachate collection data and explanation for trends observed in the leachate production data.
- c. An appendix which includes all the waste manifests documenting the transport and disposal of leachate collected from the Otay Landfill for the time period from January 1, 2012 through March 31, 2016.
- d. Site Plot Plans. The Report must contain the following plot plans.
  - i. A site plot plan with locations of all current landfill gas extraction wells and all landfill gas monitoring probes located at the Otay Landfill. The plot plan should clearly identify existing and closed landfill gas extraction wells that have been affected by rising liquid levels. Indicate if a well has been either shut-down or converted to a liquid recovery well (e.g., installed Blackhawk systems).
  - ii. A second plot plan with the features required above but emphasizing footprint and waste fill slopes located adjacent to Heritage Road and the exterior southeast facing slopes located between the soil gas vapor probes SVE-85,D and SVE-13,D (see Enclosed Figure 1).
  - iii. A plot plan indicating the location of the high density polyethylene (HDPE) on the southeast facing slope area that was installed since 2014 to prevent landfill gas from surfacing through the sideslope. The plot plan shall be accompanied by a description of the conditions and observations that led the Discharger to take corrective action to control landfill gas emissions.
  - iv. A plot plan that clearly illustrates the location and extent of the engineered liner systems for the individual phases of the landfill, and the location of the unlined portions of Otay Landfill. The legend of this plot plan shall also indicate the dates of installation for each phase at Otay Landfill.

The Report must be received by the San Diego Water Board no later than **5:00 pm on July 30, 2016.**

3. **SLOPE STABILITY WORKPLAN.** The Discharger shall provide the San Diego Water Board with a workplan and a proposed schedule for completing a slope stability evaluation, under both static and dynamic conditions, for:

- a. the waste fill southeast facing slopes located between soil gas vapor probes SVE-85,D and SVE-13,D; and
- b. the exterior southeast facing natural slopes located between soil gas vapor probes SVE-85,D and SVE-13,D; and
- c. the toe of the slope behind SVE-85,D and SVE-13, D where Baldwin Home-Fed has a cut for the construction of Heritage Road.

The slope stability evaluation workplan shall also consider and account for increased moisture content of the solid waste prism located adjacent to the southeast facing slope with particular attention given to slopes in proximity to the location of leachate collection wells (i.e., Blackhawk systems). The workplan shall include an evaluation of any modifications to the geometry at the toe of the slope as a result of grading improvements to Heritage Road to support the residential community located beyond the southeast boundary of Otay Landfill. Activities proposed in the slope stability workplan shall be adequate to evaluate the long-term stability of the slopes identified above under static and dynamic conditions. This information is needed to make recommendations for corrective actions and a timetable for implementation of those actions in the event that the landfill slopes do not meet the minimum stability requirements in title 27, Cal. Code Regs., section 21750(f)(5).

The slope stability workplan must be received by the San Diego Water Board no later than **5:00 pm on July 30, 2016**.

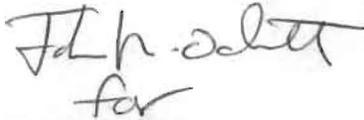
4. **FINAL SLOPE STABILITY REPORT**. The Discharger shall submit the Final Slope Stability Report to the San Diego Water Board no later than **5:00pm on October 31, 2016**. The Final Slope Stability report shall include technically defensible conclusions based upon information collected during the implementation of the Slope Stability Workplan.
5. The Discharger shall upload all the reports required by this Order in text searchable Portable Document Format format into the GeoTracker database.

Please submit all responses to the San Diego Water Board by email.<sup>4</sup> The email submittals must include a signed transmittal letter (with the facility name, facility contact information, and reference code **246288:ACali**), and be sent via email to [sandiego@waterboards.ca.gov](mailto:sandiego@waterboards.ca.gov). Information required by Order No. 90-09 and the IGP should be emailed to [sandiego@waterboards.ca.gov](mailto:sandiego@waterboards.ca.gov). Routine email correspondence however, may be sent to individual San Diego Water Board staff members. If you have any specific questions about email submittal procedures please contact Ms. Cleo Munoz in our Mission Support Services Unit at (619) 5321-3384 or via email at [Cleo.Munoz@Waterboards.ca.gov](mailto:Cleo.Munoz@Waterboards.ca.gov).

<sup>4</sup> See public notification on electronic reporting on-line at: [http://www.waterboards.ca.gov/sandiego/docs/Electronic\\_Reporting\\_Sept2014.pdf](http://www.waterboards.ca.gov/sandiego/docs/Electronic_Reporting_Sept2014.pdf)

July 11, 2016

In the subject line of any response, please include the reference code **246288:ACali**. If you have any questions or require additional information, please contact Mr. Alex Cali at (619) 521-3355, or via email at [Alex.Cali@Waterboards.ca.gov](mailto:Alex.Cali@Waterboards.ca.gov).



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Julie Chan, Chief  
Groundwater Protection Branch  
JAC:jro:ac

- Enclosures:
- 1 Southeast Corner Canyon 3 Unit Otay Landfill
  - 2 Proposed Heritage Road Grading Improvements
  - 3 Otay Landfill Inspection Report
  - 4 Otay Landfill Inspection Photographs

Technical Staff Info & Use	
Reg. Measure ID	131120
NOV Reg Measure ID	404725
Place ID	246288
Inspection ID	23233808
Violations ID	1003299, 1003301, 1003303
Order No.	90-09 and 93-86

**FACILITIES INSPECTION REPORT**

Region/Office: 9	Status: Planned	Reg. Measure ID: 131120
Program Type: LFOPER	WDID: 9 000000214	Order Number: R9-1990-0009
Scheduled Insp. Date: 02/04/2016	Actual Insp. Date:	

**Discharger Information**

Party ID: 1302	Discharger Organization Name: Republic Services (former Allied Waste), Inc	
Address: 8514 Mast Boulevard		City, State, Zip: Santee, CA 92071
Discharger Contact Person:		Discharger Contact Phone:

**Facility Information**

Place ID 246288	Facility Name: Otay Annex Sanitary Landfill	
Address: 1700 Maxwell Road		City, State, Zip: Chula Vista, CA 91913
County: San Diego	Latitude: 32.60149	Longitude: -117.01644 Method: Address Matching

**Lead Inspector Information**

Lead Inspector Party ID: 543703	Lead Inspector Name: Alex Cali		
Inspector Type:	<input checked="" type="checkbox"/> State	<input type="checkbox"/> State Contractor	<input type="checkbox"/> EPA Contractor
	<input type="checkbox"/> EPA and State (EPA Lead)	<input type="checkbox"/> EPA (Regional)	
	<input type="checkbox"/> EPA and State (State Lead)		

**INSPECTION TYPE (Check One)**

- "A" type compliance - Comprehensive inspection in which samples are usually taken (EPA Type S)
- AGT SPCC - An inspection of an above ground tank site and review of the site's spill prevention control and counter measure plant.
- "B" type compliance - A routine inspection (EPA Type C) that typically does not include collecting samples
- Complaint - Inspection made in response to a complaint
- Field Oversight - Inspection or site visit to confirm clean-up work is being performed
- Follow-up (enforcement) - Included inspections specifically made to verify compliance with enforcement mandates
- Follow-up (non-compliance) - Includes inspections specifically made to verify corrections of non-compliance where no enforcement has been initiated
- Pre-requirement - Inspection made to gather information relative to preparing, modifying, or rescinding requirements
- Pretreatment Compliance Audit - An audit that includes review of that program authority, records, and industrial facility field inspections
- Pretreatment Compliance Inspection - An inspection of a pretreatment program that includes records review and industrial facility field inspections
- MS4 Audit - An evaluation of an MS4 program or program component that could possibly lead to enforcement. It must include a site visit.
- NOT - Inspection performed in response to the submittal of a Notice of Termination coverage under a general order
- Miscellaneous - Any inspection type not mentioned above

### VIOLATIONS

Were Violations noted during this inspection?  Yes  No

Violation ID	Violation Type	Occurrence Date	Rank	Description
1003299	BMP	02/04/2016	2	Section B. 15 of Order 90-009. Erosion control BMPs are to be implemented at the start of the rainy season annually.
1003301	BMP	02/04/2016	3	Section B. 6 of Order 90-009. Prevent washout and erosion of waste materials. Erosion observed on the south side slopes.
1003303	BMP	02/04/2016	3	Section C.5 of Order 90-009. Properly operate and maintain all facilities and systems of treatment and control.

Additional violations can be noted under General Notes section below.

### INSPECTION SUMMARY (REQUIRED) (500 character limit)

The inspection resulted in several violations of Order 90-009 as well as violations to the Statewide Industrial Storm Water Permit. The violations were for lack of erosion control, evidence of erosion, and composting leachate draining to the East Storm Water Basin. Refer to attached Notice of Violation. The Storm Water violations were documented in the SMARTS database violation record No. 859912

### GENERAL NOTES (OPTIONAL) (2000 character limit)

For Internal Use (Optional)					
Reviewed By:	(1)	(2)	(3)		
CIWQS Entry Date:		Regional Board File Number:		CIWQS Inspection ID:	

# Otay Landfill

Pictures Taken by Mr. Alex Cali on February 4, 2016



Figure 1- West Storm Water Basin



North portion of West Basin was excavated prior to rainy season with intention to keep storm water onsite for reuse for dust control.

Figure 2- West Storm Water Basin



Sediment accumulated during rain events.

Figure 3- West Storm Water Basin Outlet



Straw wattles are no longer functioning as intended for erosion control. Straw wattles need to be replaced.

Figure 4- Southwest Side Slope



Figure 5- Southwest Side Slope

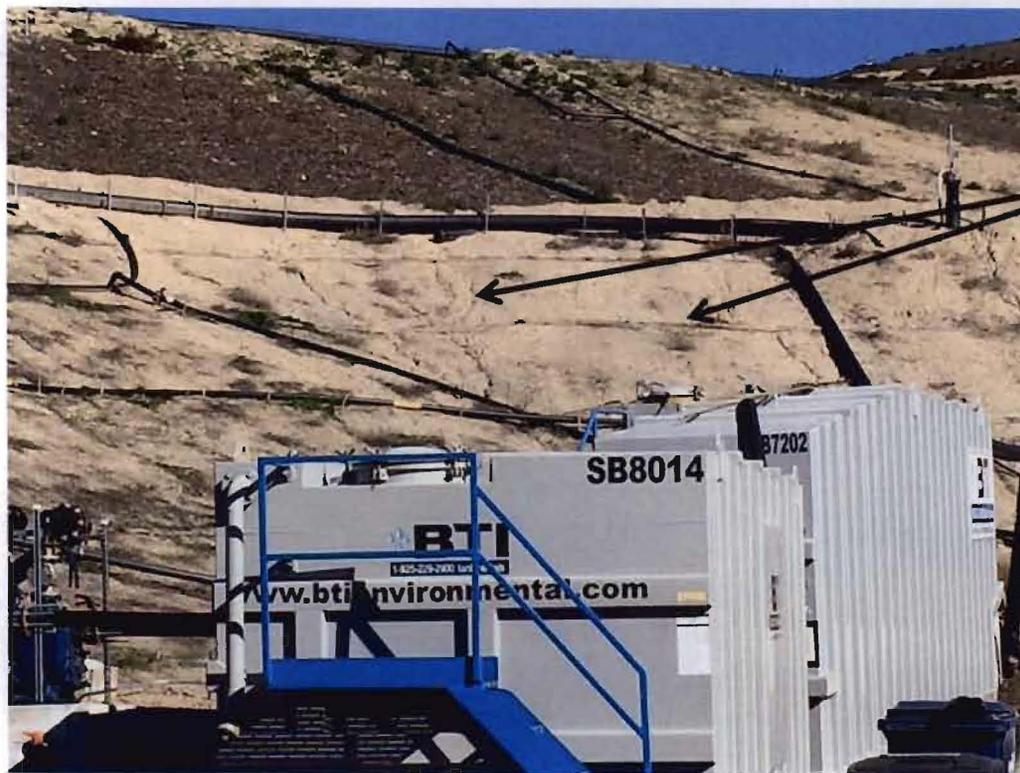


Figure 6- South Perimeter Drain Outlet



All no longer functioning BMPs need to be replaced.

Figure 7- Property Line Near Southwest Perimeter



Signs of erosion evident on the side slopes. BMPs are no longer functioning.

Figure 8- South Side Slope



Signs of erosion  
evident on the  
side slopes.

Figure 9- Side Slope Adjacent to South Basin



Figure 10- South Storm Water Basin



New straw wattles implemented in a lower risk area. While high risk erosion areas have failed or poorly implemented BMPs.

Figure 11- Near Southwest Property Line



Side slope adequately vegetated. Drainage feature clear of any debris.

Figure 12- Southwest Side Slope



The east storm water pond was observed to have a brown sheeny color.

Figure 13- East Storm Water Basin



The east storm water pond was observed to have a brown sheeny color.

Figure 14- East Storm Water Basin



Figure 15- East Storm Water Basin



The east storm water pond was observed to have a brown sheeny color.

Figure 16- Zoomed Image of East Storm Water Basin



Mulch applied to side slopes for erosion control.

Figure 17- Side Slope Adjacent to East Basin



Mulch observed with contamination.

Figure 18- Mulch Applied to Side Slope Adjacent to East Basin



Contaminants observed in mulch applied for erosion control on side slopes. Water Board staff access card show for size comparison.

Figure 19- Zoomed Image of Contaminants Observed in Mulch



Figure 20- Southeast Side Slope



Signs of erosions evident all over the side slope. No vegetation observed on the side slopes. The side slope is not implemented with erosion BMPs.

Figure 21- Southeast Side Slope



Signs of erosions evident all over the side slope. No vegetation observed on the side slopes. The side slope is not implemented with erosion BMPs.

Figure 22- Zoomed Out Image of Southeast Side Slope



Trash observed on the east landfill side slope, down gradient from the active portion.

Figure 23- East Side Slope



Unopened bottled water left on gas probe. Trash observed.

Figure 24- East Side Slope



Figure 25- East Side Slope



Figure 26- East Access Road



North side slopes were observed with established vegetation.

Figure 27- North Side Slope



Figure 28- Active Portion of Landfill



Three tons of municipal solid waste being dumped in active portion of landfill from transfer station.

Figure 29- Active Portion of Landfill

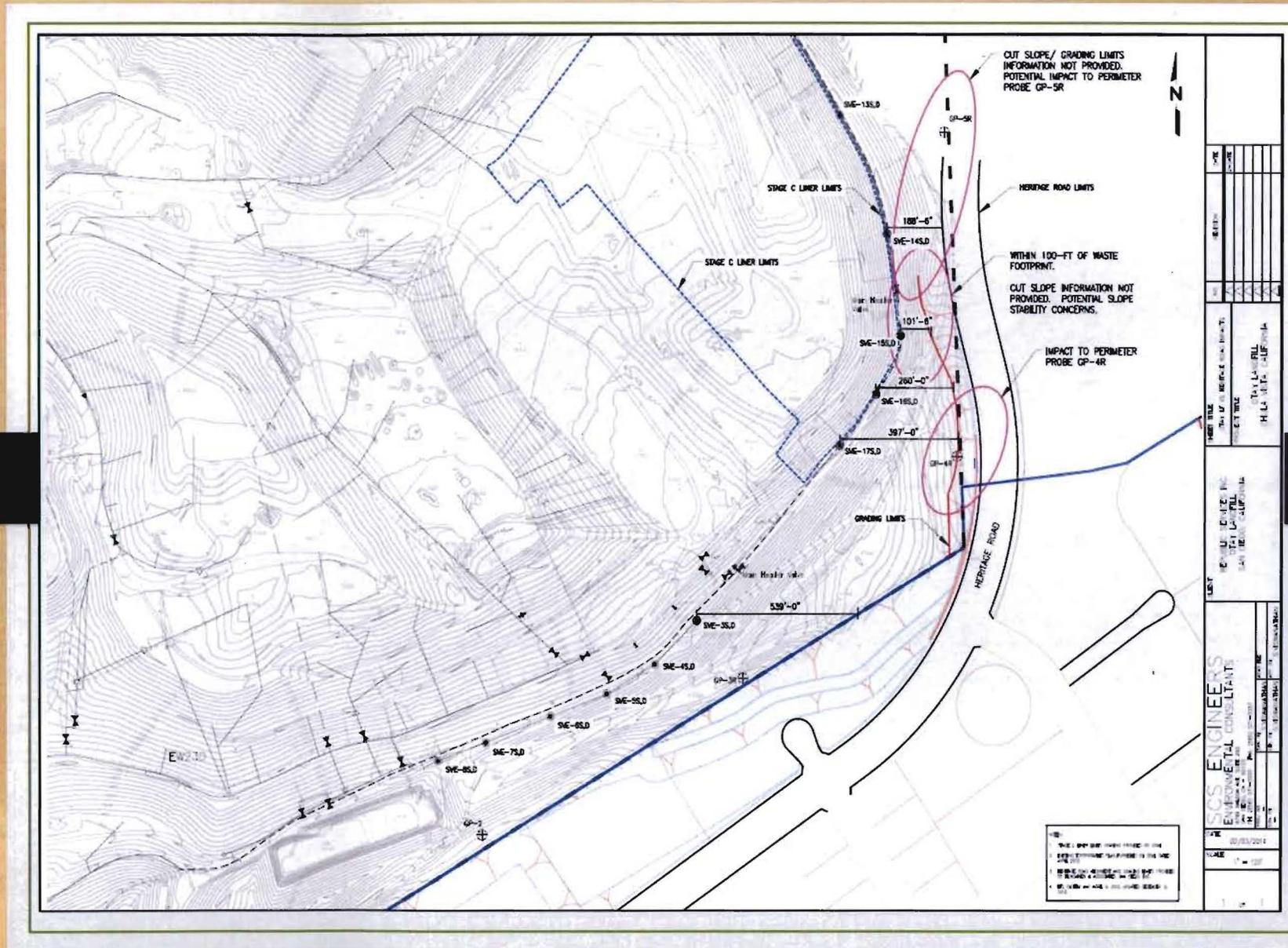
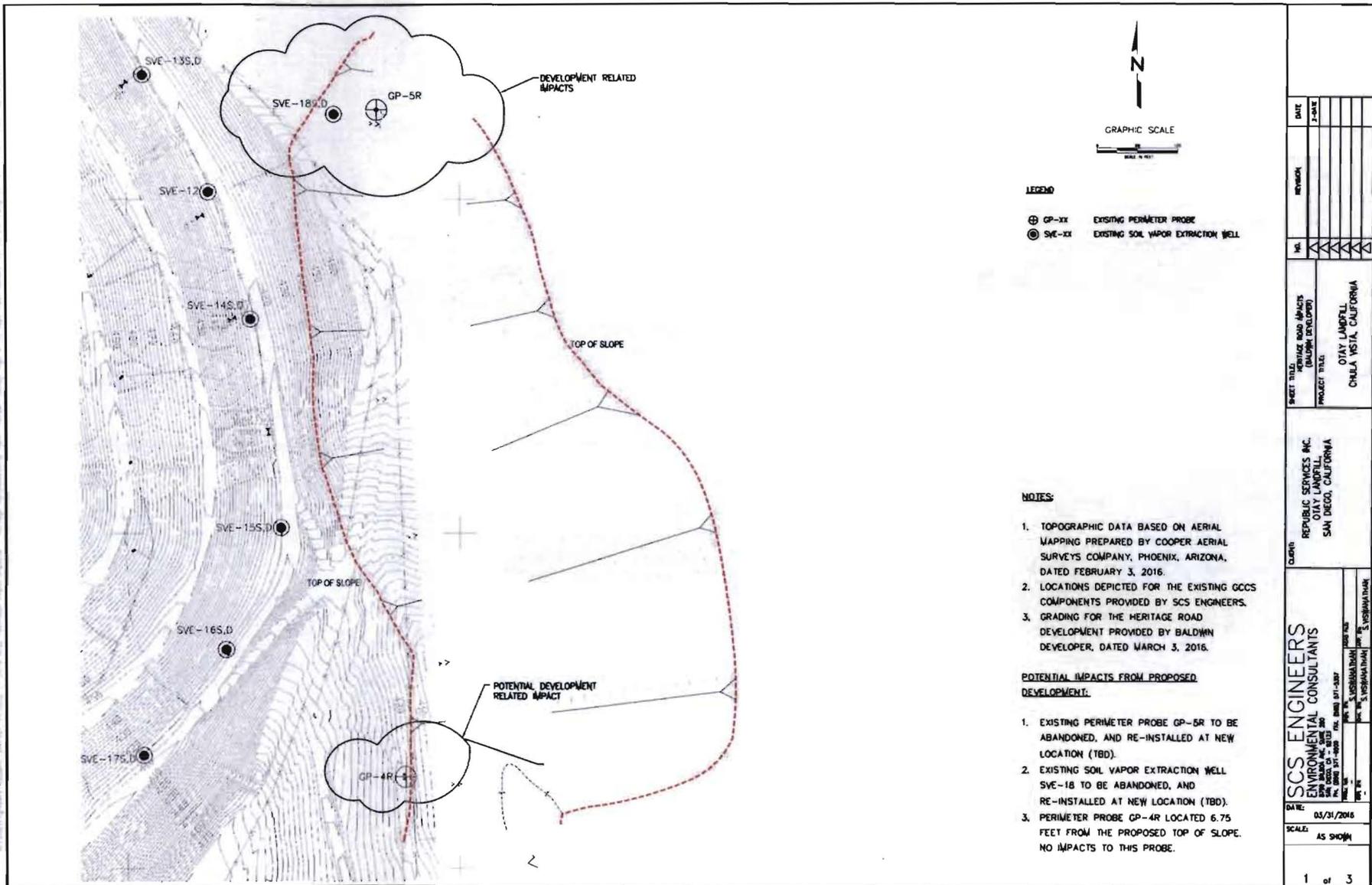


Figure from Anthony Torres, San Diego County LEA



**LEGEND**

- ⊕ GP-XX EXISTING PERIMETER PROBE
- ⊙ SVE-XX EXISTING SOIL VAPOR EXTRACTION WELL

**NOTES:**

1. TOPOGRAPHIC DATA BASED ON AERIAL MAPPING PREPARED BY COOPER AERIAL SURVEYS COMPANY, PHOENIX, ARIZONA, DATED FEBRUARY 3, 2016.
2. LOCATIONS DEPICTED FOR THE EXISTING GCCS COMPONENTS PROVIDED BY SCS ENGINEERS.
3. GRADING FOR THE HERITAGE ROAD DEVELOPMENT PROVIDED BY BALDWIN DEVELOPER, DATED MARCH 3, 2016.

**POTENTIAL IMPACTS FROM PROPOSED DEVELOPMENT:**

1. EXISTING PERIMETER PROBE GP-5R TO BE ABANDONED, AND RE-INSTALLED AT NEW LOCATION (TBD).
2. EXISTING SOIL VAPOR EXTRACTION WELL SVE-18 TO BE ABANDONED, AND RE-INSTALLED AT NEW LOCATION (TBD).
3. PERIMETER PROBE GP-4R LOCATED 6.75 FEET FROM THE PROPOSED TOP OF SLOPE. NO IMPACTS TO THIS PROBE.

DATE		DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
REVISED		REVISED	REVISED	REVISED	REVISED	REVISED	REVISED	REVISED	REVISED
NO.		NO.	NO.	NO.	NO.	NO.	NO.	NO.	NO.
SHEET TITLE		SHEET TITLE		SHEET TITLE		SHEET TITLE		SHEET TITLE	
HERITAGE ROAD IMPACTS (BALDWIN DEVELOPER)		HERITAGE ROAD IMPACTS (BALDWIN DEVELOPER)		HERITAGE ROAD IMPACTS (BALDWIN DEVELOPER)		HERITAGE ROAD IMPACTS (BALDWIN DEVELOPER)		HERITAGE ROAD IMPACTS (BALDWIN DEVELOPER)	
PROJECT TITLE		PROJECT TITLE		PROJECT TITLE		PROJECT TITLE		PROJECT TITLE	
OTAY LANDFILL		OTAY LANDFILL		OTAY LANDFILL		OTAY LANDFILL		OTAY LANDFILL	
CHULA VISTA, CALIFORNIA		CHULA VISTA, CALIFORNIA		CHULA VISTA, CALIFORNIA		CHULA VISTA, CALIFORNIA		CHULA VISTA, CALIFORNIA	
Client		Client		Client		Client		Client	
REPUBLIC SERVICES INC.		REPUBLIC SERVICES INC.		REPUBLIC SERVICES INC.		REPUBLIC SERVICES INC.		REPUBLIC SERVICES INC.	
OTAY LANDFILL		OTAY LANDFILL		OTAY LANDFILL		OTAY LANDFILL		OTAY LANDFILL	
SAN DIEGO, CALIFORNIA		SAN DIEGO, CALIFORNIA		SAN DIEGO, CALIFORNIA		SAN DIEGO, CALIFORNIA		SAN DIEGO, CALIFORNIA	
SCS ENGINEERS ENVIRONMENTAL CONSULTANTS		SCS ENGINEERS ENVIRONMENTAL CONSULTANTS		SCS ENGINEERS ENVIRONMENTAL CONSULTANTS		SCS ENGINEERS ENVIRONMENTAL CONSULTANTS		SCS ENGINEERS ENVIRONMENTAL CONSULTANTS	
DATE		DATE		DATE		DATE		DATE	
03/31/2016		03/31/2016		03/31/2016		03/31/2016		03/31/2016	
SCALE		SCALE		SCALE		SCALE		SCALE	
AS SHOWN		AS SHOWN		AS SHOWN		AS SHOWN		AS SHOWN	
1 of 3		1 of 3		1 of 3		1 of 3		1 of 3	