The following is a chronology of correspondence between the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) and the United States Marine Corps (USMC), regarding the construction of the Phase 1 expansion unit at the Las Pulgas Landfill, and subsequent violations pertaining to the expansion unit.

June 24, 1997  Letter sent by USMC (LtC K. Quigley) to San Diego Water Board (Mark Alpert). **RE: Notification of Intent to Install Leachate Collection and Removal Systems at Las Pulgas and San Onofre Landfills.**

March 5, 1998  Draft Joint Technical Document (JTD) submitted for review and comment.

March 5, 1998  Submittal of “Final Environmental Assessment for Las Pulgas Landfill permitted Disposal Area Expansion and Leachate and Recovery System Installation” by USMC.

March 11, 1998  Submittal of “Final Environmental Assessment for Las Pulgas Landfill permitted Disposal Area Expansion and Leachate and Recovery System Installation” by USMC.

March 12, 1998  Letter sent from San Diego Water Board (Mark Alpert) to Mr. Tom DeCosta, Waste Management Division. **RE: Reporting Schedule and Information update for the San Onofre and Las Pulgas Sanitary Landfills Pursuant to Regional Board Order No. 93-86.** San Diego Water Board conducting information update for landfills.


May 1, 1998  Letter from USMC (Tom DeCosta) to San Diego Water Board (Brian McDaniel). **RE: Contractor Quality Control Specifications for Construction of Landfill Liner Systems at San Onofre and Las Pulgas Landfills.** Letter contained the construction quality assurance (CQA) guidelines from the contract specifications for construction of the leachage collection and recovery system (LCRS) systems at both landfills.

July 22, 1998  Revisions to JTD submitted to San Diego Water Board from the USMC. Attached was the geosynthetic clay liner (GCL) technical evaluation.

August 3, 1998  Report submittal from EMCON to San Diego Water Board. **RE: Alternative liner design for lateral expansion of Las Pulgas and San Onofre Landfills.**

September 15, 1998 **Letter** sent from San Diego Water Board (John Robertus) to USMC (Tom DeCosta). **RE: Joint Technical Document / Report of waste Discharge; San Onofre and Las Pulgas Sanitary Landfills.** Letter acknowledges receipt of JTD (March 5, 1998), and subsequent revisions (July 22, August 3, August 24, and September 2, 1998). Letter outlines the conditions under which the USMC may proceed with the construction of the landfills as per the Water Code and Title 23.

November 20, 1998 Letter from USMC (Tom DeCosta) sent to San Diego Water Board (Mark Alpert). Letter was a summary of submittal dates for the ROWD for the expansion of the Las Pulgas and San Onofre Landfills.

December 1, 1998 Letter from San Diego Water Board (John Robertus) to USMC (Commanding General). **RE:** Letter explains that the 150-day waiting period to begin construction on the project expired on September 5, 1998 and therefore the USMC can commence with the construction of the lateral expansions of the landfills.

May 24, 1999 Construction of the liner and LCRS at Las Pulgas Landfill completed.

August 12, 1999 Letter from San Diego Water Board (Mark Alpert) sent to Commanding General. **RE: Compliance Inspection – Las Pulgas and San Onofre Landfills.** A portion of the letter outlines what is required in the CQA Liner Certification Report, as requested by USMC Environmental Security during a post-inspection briefing.


December 17, 1999 Submittal of CQA Final Documentation Report for the Las Pulgas liner expansion project.


March 24, 2000 Letter sent from San Diego Water Board (John Robertus) to the Commanding General. **RE: Waste Discharge Requirement Update – Request for Information.** Letter requests the submittal of any additional information reflecting changes that have occurred since the submittal of the 1998 Joint Technical Document.
May 10, 2000  Adoption of WDR Order No. 2000-54 by San Diego Regional Board.

June 6, 2000  Submittal of Testing Summary for Camp Pendleton Landfills from Ninyo and Moore. This submittal was submitted as the final CQA Report for the Phase 1 expansion unit.

April 21, 2003  **NOTICE OF VIOLATION NO. R9-2003-0154.** On April 8, 2003, the San Diego Water Board conducted a routine compliance inspection at the Las Pulgas Landfill after receiving an inspection report from the San Diego County LEA, informing the San Diego Water Board of a series of violations at the site. The San Diego Water Board staff observed that temporary measures had been installed on the affected slopes in an attempt to control erosion and runoff. On April 16, 2003, the San Diego Water Board conducted a follow-up inspection after another storm event. The USMC had failed to implement effective erosion and drainage control measures in the Phase 1 Expansion cell at the facility. Additional measures are required to effectively prevent further erosion and damage to drainage conveyance system parameters due to high volumes of runoff from the upper and lower decks of the Phase 1 expansion unit.

May 13, 2003  **INVESTIGATIVE ORDER NO. R9-2003-0206:** Technical Report of Damage to Waste Management Unit and Stormwater Conveyance System at the Las Pulgas Landfill. The Order set a due date of September 27, 2003 for the USMC to provide the San Diego Water Board with a technical report containing the results of their evaluation.

July 2003  USMC voluntarily halts discharges of solid waste into Phase 1 expansion cell at Las Pulgas Landfill.


January 30, 2004  **NOTICE OF VIOLATION NO. R9-2004-0044:** Upon review of a technical report (Brown and Caldwell, 2003), the San Diego Water Board staff identified a number of technical discrepancies between the as-built construction and the design specifications for the expansion of the Phase 1 waste cell. Some of those conditions are also associated with violations of WDR Order No. 2000-54.

In addition, reporting deficiencies were also identified in technical reports submitted to the San Diego Water Board by the USMC pursuant to WDR Order No. 2000-54: “Waste Discharge Requirements for the U.S. Marine Corps, Marine Corps Base Camp Pendleton, Las Pulgas Landfill, San Diego County.” These deficiencies were
associated with the WDR Discharge Specification No. B.34 requiring the U.S. Marine Corps to submit an acceptable final Construction Quality and Assurance (CQA) Report for the Phase 1 expansion unit at the Las Pulgas Landfill. Additionally, the cover letter failed to contain certification statement required by Order R9-2004-0044.


December 6, 2004 San Diego Water Board staff requested (via email) the USMC to provide complete copies of the following technical reports:


Geotechnical Report for Las Pulgas and San Onofre Landfills, Camp Pendleton, prepared by EMCOM, dated August 1996 (Geotechnical Report).

December 9, 2004 San Diego Water Board staff received the technical reports from the USMC, as requested in the December 6, 2004 e-mail.

December 13, 2004 San Diego Water Board staff met with USMC staff/management from Environmental Security, Facilities Maintenance and ROICC staff to discuss EO/staff concerns and pending enforcement actions for Las Pulgas Landfill.


February 1, 2005 NOTICE OF VIOLATION NO. R9-2005-0040. San Diego Water Board issued Notice of Violation No. R9-2005-0040 for violations of WDR Order No. 2000-54, caused by approximately 1,000 gallons of leachate overflowing the LCRS above ground tank, and discharging to unlined areas.
February 9, 2005 **NOTICE OF VIOLATION NO. R9-2005-0071.** San Diego Water Board issued Notice of Violation No. R9-2005-0071 for a leachate seep discovered by the USMC, on the side slope of the Phase 1 expansion unit.


February 23, 2007 San Diego Water Board issues a comment letter to the USMC informing the USMC that the submitted Corrective Action Plan fails to comply with the minimum requirements of the CAO (Directive B.1.c) for implementation of an alternative remedial action.


March 21, 2008  San Diego Water Board issued a letter to the USMC indicating that the Corrective Action Plan submitted in December 2007 fulfills the requirements of CAO No. R9-2006-0016 (with addenda). In that same letter, the San Diego Water Board provided the USMC with several comments regarding the Corrective Action Plan.

July 1, 2008  The USMC submitted a revised Corrective Action Plan addressing the San Diego Water Board comments from March 2008. The revised Corrective Action Plan also includes a schedule for implementation of the Corrective Action Alternative.

December 9, 2008  The USMC submitted a Report of Waste Discharge in the form of a Joint Technical Document detailing the liner design for the Phase II expansion area at the Las Pulgas Landfill. After the adoption of waste discharge requirements and upon completion of construction activities in Phase II, the USMC will implement corrective actions for the Phase I expansion area.