

EXECUTIVE OFFICER SUMMARY REPORT  
June 19, 2013

- ITEM: 5
- SUBJECT: Waste Discharge Requirements Addendum: Modification of Order No. 99-74, Waste Discharge Requirements for the Sycamore Landfill Inc., A Subsidiary of Republic Services Inc., Sycamore Landfill, San Diego County (Amy Grove)
- PURPOSE: To consider adopting Tentative Addendum No. 2 to Order No. 99-74 (Supporting Document No. 1)
- RECOMMENDATION: Adoption of Tentative Addendum No. 2 to Order No. 99-74 is recommended.
- KEY ISSUES:
1. The modified waste discharge requirements (WDRs) incorporate an engineered alternative liner design for the Stage III lateral expansion of the Landfill.
  2. The Sycamore Landfill needs Addendum No. 2 to construct additional waste units and to continue its waste disposal operations.
- DISCUSSION:
- Tentative Addendum No. 2 to Order No. 99-74 (Supporting Document No. 1) is necessary to reflect the proposed changes in the landfill liner system and to bring the waste discharge requirements into compliance with current landfill regulations. Tentative Addendum No. 2 will provide two necessary functions. First, the tentative addendum brings the already constructed Stage III-A liner design into compliance with the discharge specifications in Order No. 99-74, and second, it allows Stage III-B to be constructed using the same engineered alternative liner design.
- In August 2007, Republic Services Inc., a subsidiary of Allied Waste Industries (hereinafter, Discharger), proposed a redesign of the engineered alternative liner system for the Stage III lateral expansion area (Supporting Document No. 2). The redesign proposed an engineered alternative to the prescriptive liner requirements of California Code of Regulations (CCR) Title 27 and the Discharger

demonstrated that the proposed design met the regulatory criteria for use of an engineered alternative liner system. The demonstration showed that the proposed design offers comparable protection of water quality.

By letter dated July 21, 2008, San Diego Water Board staff concurred with the proposed modified liner design. Prior to construction, the Discharger further modified the expansion project, splitting Stage III into two phases of development: Stage III-A and Stage III-B. Although the Discharger subsequently constructed the Stage III-A unit per the staff-approved design modification, Order No. 99-74 was never revised to reflect the proposed changes to the liner system. This discrepancy came to light during staff review of the Stage III-B Design Report submitted in August 2012.

The Design Report provided technical information regarding the proposed Stage III-B expansion area and the proposed engineered alternative liner design. The Stage III-B expansion area is an approximately 10-acre unit that will provide one million cubic yards (740,000 tons) of additional waste disposal capacity for the Landfill.

The Design Report has provided the requisite demonstration that the use of an engineered alternative liner system would be as protective of water quality as a prescriptive design, and that the use of a prescriptive liner system was unnecessarily burdensome, would cost substantially more than the proposed engineered alternative, and would not promote additional attainment of applicable performance standards as required by the regulations. The proposed engineered alternative offers a redundant design by using two flexible membranes, and based on the information provided by the Discharger, meets all of the State and federal regulatory requirements.

On April 16, 2013, the Discharger provided written comments on Tentative Addendum No. 2 to Order No. 99-74 (Supporting Document No. 3). On April 23, 2013, the San Diego Water Board posed clarifying questions to solicit supplemental information pertaining to the proposed use of a weighted average to calculate the average permeability for the protective cover soil materials intended for use in the Stage III-B expansion area. Staff's questions and the Discharger's responses are documented in an email chain found in Supporting Document No. 4. The San Diego Water

Board developed responses to the Discharger's comments (Supporting Document No. 5) and made some revisions to the Tentative Addendum (Supporting Document No. 6).

**LEGAL CONCERNS:**

None

**SUPPORTING DOCUMENTS:**

1. Tentative Addendum No. 2 to Order No. 99-74 (clean copy)
2. Map Showing the Stage III-B Expansion Area
3. Comment Letter from Republic Services
4. Regional Board Questions and Discharger Responses (via e-mail)
5. Response to Comments
6. Underline/Strikeout Copy of Revised Tentative Addendum No. 2 to Order No. 99-74
7. Notification Letters

**SIGNIFICANT CHANGES:**

1. Tentative Addendum No. 2 to Order No. 99-74 modifies the Landfill liner design to include two high density polyethylene flexible membrane liner components.
2. Stage III-B adds an additional one million cubic yards of waste capacity to the Sycamore Landfill.

**COMPLIANCE RECORD:** The County of San Diego Department of Public Works, the former owner and operator of Sycamore Landfill, completed a State mandated Solid Waste Assessment Test (SWAT) investigation in 1992. The results indicated that volatile organic compounds (VOCs) had been released from the unlined portion of the Sycamore Landfill.

The release impacts two groundwater monitoring wells. These wells will continue with corrective action monitoring, which includes pumping and treating contaminated groundwater.

**PUBLIC NOTICE:**

Notification of this action was sent to known interested parties on April 8, 2013 (Supporting Document No. 7). The Tentative Addendum was also posted on the San Diego Water Board website on April 8, 2013. These actions satisfy the public notification requirements of California Water Code, Division 7, section 13167.5 and CCR Title 27, section 21730(b) for a 30-day notice.