



COUNTY OF ORANGE

Waste & Recycling

Our Community. Our Commitment.

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November 9, 2016

Amy L. Grove, P.G.
San Diego Water Board, Land Discharge Unit
3737 Main Street, Suite 500
Riverside, CA 92501

SUBJECT: Comments on Tentative Order No. R8-2016-0052

Dear Ms. Grove:

Thank you for affording OC Waste & Recycling the opportunity to comment on Tentative Order No. R8-2016-0052 (the Order). The Order proposes to name the County of Orange (County) as a discharger on the Waste Discharge Requirements (WDR) for a new private development on the privately owned Forster Canyon Landfill (Landfill). The property owner, Advanced Group SJ-99, as the sole applicant, has submitted a Joint Technical Document for its project.

In reference to Attachment C, Section B, of the Order, OC Waste & Recycling respectfully requests that the San Diego Regional Water Quality Control Board exercise its authority in requiring financial assurances such that County resources will no longer need to be relied upon for long-term maintenance and monitoring of the Landfill should the proposed private development proceed.

Attachment C, Section B, states:

The San Diego Water Board may choose to revisit the designation of the County of Orange as a discharger after the Financial Assurance instrument (in this case, a Geologic Hazard Abatement District or GHAD; see Section K – Financial Assurances) has been established and becomes financially solvent. At that time, the San Diego Water Board may find that the GHAD is a viable long-term mechanism for ensuring that post-closure maintenance and monitoring will be effectively implemented at the Forster Canyon Landfill without the financial resources of the County of Orange.

The County suggests the following revised text:

After the Financial Assurance instrument (including a Geologic Hazard Abatement District, or GHAD, or other instrument; see Section K – Financial Assurances) has been established and becomes financially solvent, the San Diego Water Board shall remove the County of Orange as a discharger, as the GHAD or other instrument will be a viable long-term mechanism for ensuring that post-closure maintenance and monitoring will be effectively implemented at the Forster Canyon Landfill without the financial resources of the County of Orange.

Supporting Document No. 5
Item 8

December 14, 2016

Please include this letter as a supporting document to the Executive Officer Summary Report to be presented to your Board on December 14, 2016.

Sincerely,



Jeff Arbour
Environmental Services Manager

cc Dylan Wright, Director, OCWR
Jeff Southern, Deputy Director, OCWR