

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

**EXECUTIVE OFFICER SUMMARY REPORT
SEPTEMBER 9, 2026**

ITEM 7

SUBJECT

United States Marine Corps (Discharger) update regarding compliance with Cease and Desist Order (CDO) No. R9-2024-0008¹ for the Camp Pendleton Las Pulgas Landfill (Landfill).

STAFF RECOMMENDATION

Information item only. No staff recommendations.

KEY ISSUES

- The San Diego Water Board issued CDO No. R9-2024-0008 to the Discharger, on February 14, 2024. CDO No. R9-2024-0008 directs the Discharger to cease accepting waste at the Landfill until the Discharger has demonstrated the following:
 - The stormwater management system is capable of managing run-on and run-off from a 24-hour, 100-year storm event.
 - The leachate collection and removal system (LCRS) is capable of managing the leachate produced at the Landfill during a 24-hour, 100-year storm event without unauthorized discharges of leachate to land, the stormwater conveyance system, or surface waters.
 - The structural integrity of all liner components are adequately evaluated, repaired, and/or reconstructed as needed, and certified by San Diego Water Board staff (staff).
- The Discharger, in response to CDO No. R9-2024-0008, submitted 1) a notice of intent to comply with California State Water Resources Control Board Order WQ 2022-0057-DWQ², as amended; 2) a *Stormwater and Leachate Management*

¹ [Revised Cease and Desist Order R9-2024-0008](#)

² National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction Stormwater Permit) Order WQ 2022-0057-DWQ.

Investigative Work Plan (IWP); and 3) a *Liner Evaluation Work Plan (EWP)*. Staff reviewed and accepted these documents.

- The Discharger received funding from the United States Legislature in Spring 2026 and subsequently awarded a contract to remove and reconstruct the Phase I Unit side slope liner system and the tie-in area to the Phase II Unit side slope liner system. Removal and reconstruction will replace the implementation of the EWP.
- The Discharger intends to begin construction activities and anticipates completion of the stormwater and leachate system investigation in the Spring 2027.

PRACTICAL VISION

Chapter 1 of the 2021 Practical Vision, [*Strategizing for Healthy Water*](#), directs the San Diego Water Board to prioritize out-come focused work that protects key beneficial uses in key areas. This item advances this goal by applying measurable, near-term actions to improve conditions at the Landfill. The investigative and reconstruction work at the Landfill is consistent with CDO No. R9-2024-0008.

Chapter 8 of the 2021 Practical Vision, [*Provide Effective Community Engagement and Communication*](#), directs the San Diego Water Board to emphasize public engagement. Inviting the Discharger to update the Board on its progress to satisfy the directives of CDO No. R9-2024-0008, emphasizes transparency and creates an opportunity for public engagement.

DISCUSSION

The purpose of this item is to provide the Board and the public with a status update of the Discharger's progress towards compliance with CDO No. R9-2024-0008.

The Discharger owns and operates the Landfill, which is classified as a series of nonhazardous waste management units (Units), in accordance with California Code of Regulations title 27, sections 20240 and 20260, and Code of Federal Regulations title 40, parts 258.10 and 258.15. The Discharger began operating the Landfill in March 1971 and the San Diego Water Board began regulatory oversight of the Landfill in 1974. The Landfill is comprised of three Units, an inactive legacy area, and two active areas (Phase I and II Units).

Highlighted in the Key Issues above, the San Diego Water Board issued CDO No. R9-2024-0008 to the Discharger on February 14, 2024, which was preceded by eight notices of violations (NOVs), over a 16-month period between 2022 and 2023. NOV Nos. R9-2022-0031, R9-2022-0051, and R9-2022-0158 highlighted concerns associated with the integrity of the Phase I and II Unit containment structures. These containment structures were compromised due to poor construction and a lack of

oversight. NOV Nos. R9-2023-0047, R9-2023-0076, R9-2023-0100, R9-2023-0101, and R9-2023-0180 highlighted concerns associated with overall poor site maintenance and poor stormwater management.

In response to these NOVs, the Discharger constructed a winterization liner to cover the existing Phase I and II Unit construction areas and waste slopes in Fall 2023. The winterization liner has temporarily prevented additional instances of erosion, exposure of waste, excess leachate generation, and unauthorized discharges of waste from the Landfill. The winterization liner will remain in place until the removal and reconstruction activities begin in 2027.

Due to the extent of damage to the Phase I and II Unit side slope liner systems, the ongoing issues with stormwater and leachate management, and the Discharger's inability to maintain compliance with Order No. R9-2010-0004, as amended, the San Diego Water Board issued the Discharger CDO No. R9-2024-0008.

CDO No. R9-2024-0008 required the Discharge to cease accepting waste at the Landfill and to:

- Enroll the Landfill in the Construction Stormwater Permit;
- Submit an IWP to investigate the functionality of existing stormwater and leachate management systems, and
- Submit an EWP to evaluate the impacts to each component of the Phase I and II Unit side slope liner systems.

On April 16, 2024, the Discharger requested an extension to the submission due dates for the IWP, EWP, and Construction Stormwater Permit notice of intent. The Discharger cited contracting issues and inability to conduct work during the rainy season as reasons for the request. On August 23, 2024, the Executive Officer extended the IWP submittal deadline (CDO Directive 36) from April 15, 2024, to December 2, 2024; and the EWP submittal deadline (CDO Directive 37) from April 15, 2024, to September 10, 2024.

In accordance with the revised CDO, the Discharger:

- Submitted the EWP to the San Diego Water Board on September 10, 2024, and a revised EWP on December 6, 2024. On May 28, 2025, staff issued the Discharger a letter of concurrence for the revised EWP, thereby requiring the Discharger to complete the implementation by July 27, 2025.

- Submitted the IWP to the San Diego Water Board on November 29, 2024, and a revised IWP on June 3, 2025. Staff issued the Discharger a letter of concurrence for the revised IWP, thereby requiring the Discharger to complete the implementation by September 27, 2025.

The Discharger requested an extension of the due date to complete the implementation of both the IWP³ and EWP⁴ to October 1, 2026. The San Diego Water Board declined the Discharger's requests and voted not to adopt *Tentative Order No. R9-2025-0178, Amendment No. 1 to 2nd Revised Cease and Desist Order No. R9-2024-0008, United State Marine Corps, Las Pulgas Landfill, United State Marine Corps Base Camp Pendelton, San Diego County*, during its regularly scheduled December 10, 2025 meeting.

Since the adoption of CDO No. R9-2024-0008, the Discharger has taken the following steps to maintain progress towards complying with the CDO directives:

- On July 31, 2024, the Discharger enrolled the Landfill in the Construction Stormwater Permit.
- In April 2026, the United States Legislature approved the Discharger's request for funds to remove and reconstruct the Phase I Unit side slope liner system, including the Phase II Unit tie-in area. The removal and reconstruction of the side slope liner system is a conservative approach to addressing staff's concerns regarding the integrity of the Landfill's containment system and the protection of water quality. This approach will be performed in lieu of implementing the EWP.
- In May 2026, the Discharger awarded the contract to remove and reconstruct the side slope liner system. Execution of the contract targets Spring 2027, to avoid the impending El Niño conditions and limit the risk of additional stormwater and leachate releases from the Landfill.
- The Discharger is currently evaluating and modeling hydrologic and hydrogeologic conditions at the Landfill using calculations and computer modeling and maintaining regular communication with staff. The sampling and leachate-line scoping activities will be conducted concurrently with the side slope liner reconstruction.

³ The request to extend the implementation completion date was submitted by the Discharger on August 25, 2025.

⁴ The request to extend the implementation completion date was submitted by the Discharger on October 28, 2025.

COMPLIANCE RECORD

Including the enforcement actions described above, the San Diego Water Board has issued 15 NOVs, a Cleanup and Abatement Order, and a CDO to the Discharger, between January 2004 and July 2026. The following information briefly summarizes these enforcement actions:

Notices of Violations: Violations cited in the NOVs consist of failures to 1) submit required reports to the San Diego Water Board, and/or 2) construct, operate, and maintain the Landfill in accordance with applicable State and federal laws, regulations, plans, policies, and orders. Currently, eight of these NOVs remain active, but will become historical once the Discharger satisfies the CDO directives.

Cleanup and Abatement Order: The San Diego Water Board issued Cleanup and Abatement Order (CAO) No. R9-2006-0016 in 2006, which required the Discharger to investigate failure of the Phase I Unit side slope liner system, and develop a corrective action recommendation for the San Diego Water Board's consideration. The Discharger completed corrective actions and satisfied the requirements of CAO No. R9-2006-0016 on March 27, 2014.

Cease and Desist Order: The San Diego Water Board issued the CDO on February 14, 2024, which required the Discharger to 1) investigate the Landfill LCRS and stormwater conveyance system failures during the 2022 and 2023 rainy seasons, and 2) evaluate the integrity of the Phase I Unit side slope liner system. The CDO will remain active until the Discharger fully complies with directives.

PUBLIC NOTICE

The agenda notice for today's meeting was posted on the San Diego Water Board's website and sent to subscribers to the email list for Board meetings. This satisfies the *Bagley-Keene Open Meeting Act* requirements to publish the meeting notice and agenda.

SUPPORTING DOCUMENTS

None.