



**STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION**

**STAFF REPORT FOR THE BOARD MEETING OF DECEMBER 3, 2004**

Prepared on November 4, 2004

**ITEM: 16**

**SUBJECT: REVISED WASTE DISCHARGE REQUIREMENTS ORDER NO. R3-2004-0111, FOR PACHECO PASS LANDFILL, INC., SANTA CLARA COUNTY, NORCAL WASTE SYSTEMS**

**KEY INFORMATION:**

**Location:** Approximately seven miles east of the City of Gilroy at 3675 Pacheco Pass Highway, Gilroy, Santa Clara County, California

**Types of Waste:** Non-hazardous municipal solid wastes, construction and demolition waste and inert waste.

**Current Capacity for MSW:** 265,000 cubic yards remaining.

**Proposed Capacity for Construction and Demolition Waste/Inert Waste:** 2,300,000 cubic yards remaining.

**Disposal Method:** Area fill method

**Liner System:** Active MSW area is lined with composite liner. Prepared subgrade, high density polyethylene liner and leachate collection and recovery system, and operations layer proposed for construction and demolition waste. Inert waste will be placed on native soil.

**Groundwater Contamination:** Volatile Organic Compounds (VOCs) in wells E-4, E-7, E-8, E-10, and E-21. Sporadic VOC hits in E-6 and E-23.

**Existing Orders:** Waste Discharge Requirements Order Nos. 94-72, 93-084 (Landfill Super Order), 97-03 DWQ (General Industrial Storm Water Permit), and Region-Wide Cleanup and Abatement Order No. R3-2002-0130.

**SUMMARY:**

Revisions to the Pacheco Pass Class III and Inert Waste Landfill (Landfill) Waste Discharge Requirements (Order) as provided in proposed Order No. R3-2004-0111 (**Attachment 1**) and Monitoring and Reporting Program No. R3-2004-0111 (**Attachment 2**), are required due to proposed facility and waste stream changes. The proposed changes at the Landfill and within the Order include:

- Modification to the design and waste stream of Module B-D.
- Reclassification of Module B-D as a non-MSW Class III landfill unit with a restricted waste stream.

- A review of existing environmental monitoring systems including groundwater, landfill gas, leachate and surface water in the Monitoring and Reporting Program.
- Update Order 94-72 to require Landfill compliance with California Code of Regulations Title 27, Solid Waste, effective July 18, 1997; and, 40 CFR Parts 257 and 258 Solid Waste Facility Disposal Criteria, Final Rule, as promulgated October 9, 1991.

The proposed Order covers the current Landfill operations and provides guidance and requirements for planned changes at the Landfill.

## DISCUSSION

### Landfill Description

The Landfill is located on the western flank of the Diablo Range adjacent to, and east of the Santa Clara Valley. The Landfill is located in an unincorporated area of south Santa Clara County, California, approximately seven miles east of the City of Gilroy. The Landfill is located in Section 12, Township 2 South, Range 4 East, Mount Diablo Base and Meridian as shown on **Figure 1 of Attachment 1**.

The primary land use surrounding the Landfill consists of cattle grazing, farmland and open space with typical 20- to 40-acre spacing. Adjacent land use zones vary within one mile of the site and include the following, in order of decreasing area:

- Exclusive agricultural (greenbelt) - grazing and farmland
- Hillside - principally grazing land and undeveloped land
- Agricultural ranchlands - similar to hillside zoning
- Agricultural productive - exclusively farmland
- Scenic Highway

There are no residences within 1,000 feet of the landfill boundaries. The nearest residence is approximately 2,800 feet west of the landfill.

The site topography is characterized by the natural southwest-facing hillsides ranging in elevation from 300 to 550 feet above mean sea level (msl). The southwest-facing slopes are locally dissected by southwest-trending drainages that drain to the Santa Clara Valley. The elevation of the Santa Clara Valley floor southwest of the site is approximately 150 feet msl. Natural slopes of the site range in grade from 10 percent to 40 percent. The main trace of the northwest-trending Calaveras fault zone is approximately 800-feet to 1,000-feet northeast of the Landfill and is an active Holocene fault (**Attachment 1, Figure 2**). The existing

topography for the site is shown in **Attachment 1, Figure 3**.

The Landfill includes a 31-acre permitted Class III Landfill designated for municipal solid waste (MSW), which consists of a closed unlined landfill and a composite lined active landfill. The active landfill is referred to as Module A. An engineered buttress fill of inert waste (predominantly shredded tires) exists to north and west of Module A to allow continued placement of MSW within the limits of Module A as shown on **Figure 2 of Attachment 1**. The Landfill also includes a 35-acre area permitted for inert waste disposal, which is referred to as Modules B, C and D. The Landfill area designated as Modules B-D, currently serves as the soil borrow site for Module A, but inert wastes have also been placed within unlined excavations of the native soil and bedrock materials in this area. Additionally, a composting facility exists in the northern portion of the Landfill that is owned and operated by South Valley Organics, a dba of Norcal Waste Systems Pacheco Pass Landfill.

Municipal solid waste is primarily received from Gilroy, Morgan Hill and the unincorporated areas of southern Santa Clara County, including San Martin. Solid wastes delivered to the Landfill, classified as residential, commercial, and industrial, are transported to the site by commercial haulers. The Landfill is closed to the public. As materials arrive on site, they are handled according to four general categories:

- Inert waste for disposal in Modules B-D and used as alternative daily cover (ADC);
- MSW for disposal in Module A (composite lined cell);
- Green waste suitable for composting or ADC;
- Inert waste suitable for buttress construction, north and west of Module A.

The Landfill is also permitted to receive non-hazardous dewatered sewage sludge, non-hazardous water-treatment plant sludge, friable and non-friable asbestos, construction and demolition wastes, food processing wastes, agricultural wastes, and tires.

In 2003, the Landfill received approximately 91,400 tons and 64,800 tons of MSW and inert waste, respectively. Due to limited capacity remaining for the MSW Landfill, the incoming MSW tonnage will be reduced to 15,000 tons per year starting in July 2004 and remain at that level until Module A reaches maximum capacity. Based on the new MSW tonnage estimates, the remaining space in Module A is approximately 265,000 cubic yards (cy). However, approximately 206,000 cy of remaining space is available until Modules B-D reach capacity. Therefore, Module A is estimated to reach capacity in approximately six years, based on 206,000 cy of space remaining and a space consumption ratio of approximately 2.19 cy per ton of waste placed. No composite lined cells will be built thereafter. The Modules B-D portion of the Landfill will have approximately 2.3 million cy of capacity and is expected to receive 78,000 to 132,000 tons of construction and demolition waste (C&D) and inert waste annually starting in July 2005. The incoming waste volumes are assumed to increase at a rate of 3 percent per year. Therefore, Modules B-D are expected to reach capacity between 12 and 18 years in the future, based on a space consumption ratio of 1.4 cy per ton of waste received and a daily cover to waste ratio of 3 to 1. The engineered buttress, north and west of Module A requires approximately 450,000 cy of fill material to achieve targeted capacity.

Wastes are disposed of utilizing the area-fill disposal method. Waste is typically placed with an operating slope of 2:1 (horizontal to vertical) or flatter. The waste is typically pushed down the fill slope and spread and compacted in 2-foot-thick layers.

#### **Landfill History**

The Landfill was originally situated on three parcels of land that are now subdivided into five parcels. Parcel 1 and 2 were approximately 31 and 45 acres, respectively, and were jointly owned by Mr. and Mrs. F.L. Furtado and the Gilroy Garbage Company. Norcal Waste Systems Pacheco Pass Landfill, Inc. (Discharger) owns Parcel 3, which encompasses approximately 60 acres. In 1986, Parcels 1 and 2 were officially split between the Furtados and

the Gilroy Garbage Company resulting in the current parcel designations of 1A, 1B, 2A, and 2B. The Furtados own Parcels 1A and 2A and the Gilroy Garbage Company owns Parcels 1B and 2B. In 1993, an environmental easement of approximately 31.5 acres adjacent to and southwest of Parcels 1A and 1B was obtained from the Furtados for construction and access to necessary environmental control facilities (drainage structures, monitoring wells, landfill gas collection and control systems, etc.). The Discharger assumed landfill operations for the entire site in 1973. The Discharger currently has an agreement with Gilroy Garbage to conduct solid waste management operations and with the Furtados to provide ongoing site maintenance and environmental monitoring.

The Landfill was first operated by Gilroy Garbage in 1963. To accommodate local agricultural processing activities, filling took place mostly in the summer months from 1963 through 1974. During the winter, operations were moved to the Gilroy Landfill on the Santa Clara Valley floor. Year-round use of the Landfill began in 1974.

Since 1963, the Landfill has received commercial, agricultural, and residential wastes from Gilroy, Morgan Hill, and the unincorporated areas of Santa Clara County, including San Martin. Limited information is available on landfill practices during the early years of site operation but records indicate that disposal began on Parcel 1 in 1963 and continued until August 1989. After 1989, operations were moved from Parcel 1 to primarily Parcel 3 with some fill activities remaining on Parcel 1B.

The Regional Board has regulated waste discharge at the Landfill since 1972. Waste Discharge Requirements Order No. 72-55 was adopted on September 8, 1972 and replaced by Order No. 78-09 on September 8, 1978 to include Water Quality Control Plan basin objectives. On February 8, 1985 Order No. 85-11 was adopted to approve a landfill expansion and reflect newly adopted landfill regulations. The WDR allowed continued disposal of Class III wastes in Parcel 1 and permitted expansion of disposal operations from Parcel 1 into Modules

A, B, and C in Parcel 3 (**Attachment 1, Figure 2**).

In 1986, Holocene faults of the Calaveras Fault system were found to underlie the Landfill. Identification of these faults during excavation of Module A established that the expansion design did not meet the siting requirements of Chapter 15, of the California Code of Regulations (Chapter 15) for disposal of Class III waste. On February 16, 1990, the Regional Board adopted WDR Order No. 90-34 to approve changes to the conceptual development plan for the Landfill. However, due to additional fault discoveries, the Regional Board requested another conceptual development plan for the Landfill. In response to the Regional Board's request, the Discharger submitted "The Operations Plan, Pacheco Pass Class III and Inert Waste Landfill" (Operations Plan) which proposed development of Modules B, C, and D for inert waste, and a stabilizing buttress fill to the north and west of Module A. The stabilizing buttress north and west of Module A was proposed to allow for continued placement of Class III waste in Module A. The Regional Board approved the Operations Plan and adopted Order No. 94-72 on October 14, 1994.

The Discharger submitted a Joint Technical Document (JTD) on October 2, 2003. The Discharger submitted revisions to the JTD on August 10, 2004 in response to comments from Regional Board staff in a letter dated July 9, 2004. Within the JTD, the Discharger proposes modification of the existing design and operations of the Landfill. In response, Regional Board staff issued Draft Order R3-2004-0111 on September 3, 2004, to allow for a modification to the design and waste stream for Modules B-D and to update Order No. 94-72 to require Landfill compliance with CCR Title 27, Solid Waste, effective July 18, 1997; and, 40 CFR Parts 257 and 258 Solid Waste Facility Disposal Criteria, Final Rule, as promulgated October 9, 1991 (40CFR 257 and 258).

#### **Compliance History**

With the exception of on-going groundwater contamination from the unlined Landfill, the Discharger has been in substantial compliance with Order 94-72 since the last Order update in

1994. A comprehensive file review from October 1994 to present resulted in four Notice of Violations (NOVs) for late reports.

Notice of Violations were issued on June 28, 1996 and July 24, 1996 for failure to submit a Final Corrective Action Plan. An NOV was also issued on May 1, 1997 for failure to submit a Closure Plan. Similarly, a violation was noted on July 2, 1999, for non-submittal of an annual report due on July 1, 1999. In each case, the Discharger submitted the delinquent report in a timely fashion.

With the exception of the above, the Discharger is responsive to Regional Board staff's information requests and addresses compliance issues. At this time, staff is not recommending Order or Monitoring and Reporting Program changes based on prior formal or informal compliance issues.

#### **Proposed Landfill Changes**

The primary change associated with this updated Order is to reclassify Modules B-D as a non-MSW Class III landfill unit with a restricted waste stream. Portions of Modules B-D will be lined and unlined. Only inert wastes, as defined in CCR Title 27 20230(a), will be disposed of in the unlined portions of Modules B-D. The lined portions of Modules B-D will be restricted to the disposal of C&D and inert waste only. Construction and demolition wastes are defined in the proposed Order No. R3-2004-0111, Specifications C.3.

#### **GEOLOGY:**

The Landfill is located on the western flank of the Diablo Range adjacent to and east of the Santa Clara Valley. The main trace of the northwest trending Calaveras fault zone is approximately 800-feet to 1,000-feet northeast of Parcel 1 and 3 and is an active Holocene fault (**Attachment 1, Figure 2**).

The Diablo Range in the vicinity of the site is composed primarily of Pleistocene to Cretaceous sedimentary and volcanic rocks. On the western margin of the range, rocks are folded and faulted along the Calaveras Great Valley Sequence. The Santa Clara Valley, a northwest-trending

structural depression between the Diablo Range on the east and the Santa Cruz Mountains on the west, is underlain by Quaternary alluvium that overlies the older Santa Clara Formation and the Pliocene-age Purisima Formation. Bedrock materials beneath the Landfill consist entirely of the Santa Clara Formation and bedding and structural features generally trend northwest. The Santa Clara Formation was originally deposited in an alluvial fan environment, and is composed of discontinuous lenticular irregularly bedded claystone, siltstone, sandstone, and conglomerate.

The soil beneath and within one mile of the Landfill consists of loams and gravelly loams with lesser amounts of clay. The three predominant soil series are the Altamont, the Azule, and the Gaviota. The southern corner of the site encompasses the majority of the active landfill area and is underlain by Altamont clay. The central portion of the site including the northeastern strip of the active landfill area is underlain by Azule clay loam. The narrow strip of soil along the northeast border of the site is also composed of Azule clay loam.

The landfill is located along the southwest portion of the Calaveras Fault. The Calaveras Fault is considered Holocene in age because movement has been recorded within the last 10,000 to 12,000 years. Active segments of the Calaveras Fault system divide the site into four unique fault blocks. The fault blocks are characterized by northwest-trending strikes and opposing dips. Three active secondary faults trending subparallel to and west of the Calaveras Fault, have been traced beneath both Parcels 1 and 3. The first two traces of the Calaveras Fault system dip steeply to the northeast toward the main trace of the Calaveras Fault. They divide the bedrock underlying the site into three fault blocks informally referred to as the eastern, central, and western fault blocks. Where the fault traces are exposed they contain cohesive sheared clayey gouge. The Calaveras Fault is capable of generating earthquakes up to magnitude 7.0 with ground accelerations around 0.69g at the Landfill. The nearby San Andreas is considered to be capable of generating earthquakes up to magnitude 8.3 with ground accelerations of 0.47g at the Landfill.

## **HYDROGEOLOGY AND GROUNDWATER:**

The Landfill is located in a complex fractured-bedrock hydrogeologic regime situated on the eastern margin of the southern Santa Clara Valley groundwater basin. The Landfill lies within the Pacheco-Santa Ana Creek Hydrogeologic Area of the Pajaro River Hydrologic Unit. Surface drainage could potentially reach the Pajaro River but the Landfill lies outside the Pajaro River 100-year floodplain. Aquifers beneath the Santa Clara Valley are the principal sources of groundwater in the area. Wells in the basin draw water from a combination of alluvial deposits in the underlying Santa Clara and Purisima Formations. The Santa Clara Formation contains groundwater within the more permeable conglomerate and sandstone beds which is controlled by stratigraphy and geologic structure. Groundwater flow in the Santa Clara Formation on the upland margins near the site is strongly influenced by individual fault traces of the Calaveras Fault zone which appear to act as barriers to groundwater flow. Within the fault blocks, groundwater flow is influenced by lithology. Although the regional hydraulic gradient is toward the valley, pathways are complex because of the restrictions to groundwater flow caused by fault boundaries in the area of the site.

The nearest downgradient well is approximately 2,500-feet from Parcel 1 of the Landfill. The owner of the southern portion of Parcel 1 owns the well and uses water for municipal, industrial and domestic supply.

## **GROUNDWATER MONITORING:**

The Discharger has conducted groundwater monitoring at the Landfill since August 1985. Informal verification monitoring began when indications of groundwater impacts (i.e., volatile organic compounds [VOCs], inorganics) were detected in 1987. On February 16, 1990, the Regional Board adopted WDR Order No. 90-34 that included an evaluation monitoring program for Parcel 1 and a detection monitoring program for Parcel 3. The present groundwater monitoring system consists of 14 groundwater monitoring wells; 9 wells in detection

monitoring and 5 wells in corrective action monitoring. **Figure 4 of Attachment 1** shows the monitoring well locations. Due to the complex hydrogeology at the site, distinctions between background and downgradient monitoring wells are not clearly defined. A groundwater monitoring evaluation report is required in the proposed WDR to define the appropriate monitoring wells and to propose the installation of additional monitoring wells, if required.

Inorganic groundwater chemistry is monitored using intrawell statistical analysis. Intrawell analysis uses the wells own historic data to determine if concentrations are significantly increasing over time. Groundwater is also monitored for VOCs. Historically, VOCs have been detected in several monitoring wells surrounding the Landfill.

According to the First and Second Quarter 2004 Semi-Annual Report, there have been sporadic trace VOC detections in detection monitoring wells E-6 and E-23. The sporadic detections of VOC have been attributed to landfill gas migration. Additional gas extraction wells were installed in 2002 to improve the control of landfill gas migration and nearby gas extraction wells were adjusted on a regular basis to maximize gas extraction without overdrawing the system. VOC concentrations in groundwater show decreasing trends following installation of the additional gas extraction wells.

The corrective action wells (E-4, E-7, E-8, E-10, E-21) continue to show low concentrations of several VOCs. VOCs detected during the second quarter of 2004 include dichlorodifluoromethane at concentrations up to 1.9 micrograms per liter ( $\mu\text{g/l}$ ); 1,1-dichloroethane at concentrations up to 2.0  $\mu\text{g/l}$ ; cis-1,2-dichloroethene at concentrations up to 26  $\mu\text{g/l}$ ; methylene chloride at concentrations up to 2.8  $\mu\text{g/l}$ ; tetrachloroethene at concentrations up to 35  $\mu\text{g/l}$ ; trichloroethene at concentrations up to 10  $\mu\text{g/l}$ ; and trichlorofluoromethane at concentrations up to 1.9  $\mu\text{g/l}$ . Some of the VOCs are detected above the maximum contaminant level (MCL) and Basin Plan objectives. The Landfill has implemented source control measures involving reduction of infiltration to the Landfill and removal of

leachate and landfill gas as long-term corrective action measures. Corrective action measures implemented at Parcel 1 include:

- Installation and operation of a leachate removal and handling system, upgrading the system by installing additional wells, upgrading pumps, and implementing additional leachate storage capacity;
- Controlling infiltration through placement of final cover on closed portions of the Landfill;
- Installation and operation of a landfill gas extraction system; and
- Installation of a moisture barrier on the north-facing sideslope of Parcel 1 as part of the construction of Phase IV within Module A.

Since groundwater monitoring was instituted at the Landfill, all the wells, including background well E-1, have consistently exceeded secondary MCL's for total dissolved solids (TDS) (500 milligram per liter [ $\text{mg/l}$ ]) and specific conductance (900 micromhos per centimeter [ $\mu\text{mhos/cm}$ ]). According to the First and Second Quarter 2004 Semi-Annual Report, all first and second quarter 2004 inorganic results were within the concentrations limits for the detection monitoring wells with the exception of nitrate in well E-25. The analytical results were compared to concentration limits calculated using data through the end of fourth quarter 2003. The nitrate concentrations detected during the second quarter of 2004, in E-25, exceeded the concentration limit for nitrate (9.3  $\text{mg/l}$ ) by 0.6  $\text{mg/l}$ . Nitrate concentrations have fluctuated historically at E-25, therefore, nitrate concentrations will be closely monitored during the next sampling event to evaluate if nitrate concentrations continue to increase. For the corrective action monitoring wells, statistically significant trends were calculated for all inorganic parameters. Trends are calculated to monitor for any significant increases of inorganic parameters which may indicate a release.

### Groundwater Degradation and Remediation Effectiveness

Corrective action monitoring wells continue to exhibit low concentrations of several VOCs. The number of VOCs detected above reporting limits has decreased since implementation of corrective action measures at the Landfill. Leachate extraction and final cover placement over portions of the Landfill began in 1991. Landfill gas extraction and other corrective actions began in 1995. Additional gas extraction wells were installed in 2002 and subsequently, decreasing trends of VOCs in groundwater have been observed. However, due to the continued presence of VOCs in corrective action monitoring wells, ongoing operation of the landfill gas extractions system will be required.

### Surface/Storm Water

Surface water is monitored at three locations around the Landfill, identified as SW-1, SW-2, and SW-3 as shown on **Figure 3 of Attachment 1**. Surface water monitoring is conducted in accordance with this proposed Order and State Water Board's National Pollutant Discharge Elimination System (NPDES) General Industrial Storm Water Permit and the facility's Storm Water Pollution Prevention Plan (SWPPP). The surface water sampling activities are conducted quarterly when surface water is present, and consist of run-off sampling and analysis at three sample locations. SW-1 monitors storm water run-off prior to discharge to the off-site sedimentation retention basin located south of Parcel 1, whereas SW-3 monitors the discharge from the on-site sedimentation retention basin in the northwest property corner. SW-2 monitors discharge along the southern property boundary.

The landfill design incorporates access roads, drainage benches, culverts, overside drains, and collection berms to control the run-off. A perimeter drainage channel on the north side of the Landfill collects run-off from a majority of the Landfill and composting facility and directs it to a sedimentation pond located at the northwest corner of the Landfill. The water from the pond then discharges west through an overflow spillway into natural drainage swales that transmit flow toward the drainage facilities for Pacheco Pass Road and on toward the Santa

Clara Valley and Pajaro River. The sedimentation pond and spillway has been designed to accommodate the discharge from the 100-year, 24-hour storm.

Rainfall is seasonal with the majority of the precipitation falling between November and March. The annual average precipitation recorded for the city of Gilroy is estimated to be 19.8 inches for the years 1961 to 1990. Based on the isohyetal map of California, the annual precipitation at the site is approximately 16 inches. The site-specific 100-year, 24-hour storm is 7.5 inches.

Storm water is monitored to ensure there is no discharge of leachate or other pollutants that may affect beneficial uses. Storm water monitoring parameters are included in **Table 3 of Attachment 2**.

In addition to this Order, the Discharger is required to be covered under a Statewide General Storm Water Permit. On February 24, 1992, the Discharger submitted a "Notice of Intent" to comply with the "State Water Resources Control Board Water Quality Order No. 97-03-DWQ National Pollutant Discharge Elimination System General Permit No. CAS000001 Waste Discharge Requirements for Discharge of Storm Water Associated with Industrial Activities Excluding Construction Activities".

### PROPOSED ORDER CONTENTS:

1. **General Information:** The section includes discussions of the site's geology and hydrogeology, water quality, operations, proposed liner design, beneficial uses of the water, and surrounding land use.
2. **Compliance with other Regulations, Orders and Standard Provisions:** This section directs the Discharger to:
  - No longer comply with Regional Board Order No. 93-84 (Landfill Super Order), because Order R3-2004-0111 addresses the requirements of Order No. 93-84.
  - Comply with all applicable requirements contained in CCR Title 27, and 40 CFR 257 and 258.

- Comply with State Water Resources Control Board Water Quality Order No. 97-03-DWQ, which addresses storm water associated with industrial activities, commonly referred to as “General Permit.”
3. **Prohibitions:** These discharge prohibitions are applicable to Class III, C&D and inert waste disposal.
  4. **Specifications:** These are specifications that the Discharger must meet and/or implement to comply with site specific aspects of CCR Title 27 and 40 CFR 257 and 258 pertaining to solid waste disposal practices. These specifications are categorized into several groups; a) General Specifications, b) Wet Weather, c) Design Criteria and, d) Closure. This section also defines inert wastes and construction and demolition waste.
  5. **Water Quality Protection Standards:** These standards outline constituents of concern, monitoring parameters, concentration limits, monitoring points, points of compliance, and compliance period.
  6. **Provisions:** This section addresses the Discharger’s responsibilities regarding Landfill-related impacts to water quality and provide: Regional Board access to the Landfill and related reports; Order severability; a termination clause; and wet weather operations provisions.

#### **MONITORING AND REPORTING PROGRAM (MRP) CONTENT:**

**Monitoring and Observation Schedule:** This section contains requirements for periodic routine inspections of the landfill and the leachate collection system, and detailed analytical monitoring of groundwater, leachate and landfill gas.

**Sample Collection and Analysis:** This section establishes criteria for sample collection and analysis, methods to determine concentration limits, and specifies how these records shall be maintained. Detailed sampling and analysis

procedures are contained in a separate sampling and analysis plan. This section also defines how inorganic and organic analytical data must be evaluated and outlines the procedure for evaluating a new release.

**Reporting:** This section establishes formats and requirements that the Discharger must follow when submitting analytical data, annual reports, and summaries to the Regional Board.

**Definition of Terms:** This section defines a number of terms used in the MRP.

#### **ENVIRONMENTAL SUMMARY:**

This project involves an update of Waste Discharge Requirements initiated by the Regional Board. These Waste Discharge Requirements are for an existing facility and as such are exempt from provisions of the California Environmental Quality Act. (Public Resources Code, Section 21000, et seq.)

#### **COMMENTS TO DRAFT ORDER AND MRP NO. R3-2004-0111:**

Draft Order R3-2004-0111 and MRP R3-2004-0111 were distributed to a list of interested parties and agencies that have been historically involved with the Landfill.

No written comments were received on proposed Order and MRP R3-2004-0111. A list of interested parties is included in Attachment 3.

#### **RECOMMENDATIONS:**

Adopt proposed Waste Discharge Requirements Order No. R3-2004-0111.

#### **ATTACHMENTS:**

1. Proposed Waste Discharge Requirements Order No. R3-2004-0111.
2. Proposed Monitoring and Reporting Program No. R3-2004-0111.

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