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ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

February 28, 2019

Kristen Ruffell, Section Head
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, California 90601

TRANSMITTAL OF RESPONSE TO COMMENTS FOR THE TENTATIVE WASTE DISCHARGE REQUIREMENTS - SCHOLL CANYON LANDFILL, 7721 NORTH FIGUEROA STREET, GLENDALE, CALIFORNIA (FILE NO. 60-117, GEOTRACKER GLOBAL ID L10009414153)

Dear Ms. Ruffell:

On January 23, 2019, the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) transmitted a tentative Waste Discharge Requirements (WDRs) order for the subject facility. A letter was submitted to the Regional Water Board by the County Sanitation Districts of Los Angeles County on February 22, 2019, providing comments on the tentative Order. Regional Water Board staff considered the comments submitted and is providing a response to the comments (enclosed). An updated copy of the tentative order, including all changes made after January 23, 2019, is also enclosed.

In accordance with administrative procedure, the Regional Water Board at a public hearing to be held on March 14, 2019, at 9:00 a.m., at the Port of Long Beach Hearing Room, 4801 Airport Plaza Drive, Long Beach, will consider the tentative WDRs. It is expected that the Board will take action at the hearing; however, as testimony indicates, the Board, at its discretion, may order further investigation.

If you have any questions, please contact Mr. Douglas Cross (Project Manager) at (213) 620-2246 or dcross@waterboards.ca.gov, or Dr. Wen Yang, Chief of Land Disposal Unit, at (213) 620-2253 or wyang@waterboards.ca.gov.

Sincerely,

Deborah J. Smith
Executive Officer

cc: Brianna St. Pierre, State Water Resource Control Board
(Brianna.St.Pierre@waterboards.ca.gov)
Benjamin Escotto, Cal Recycling (Benjamin.Escotto@calrecycle.ca.gov)
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RESPONSE TO COMMENTS ON THE TENTATIVE WASTE DISCHARGE REQUIREMENTS
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY
SCHOLL CANYON LANDFILL

No.	Comment	Response	Action Taken
1	**Regarding Section C.2.g of the MRP** Section C.2.g of the MRP describes the statistical data analysis methodology. The Sanitation Districts request language be included in the MRP to clarify the requirements for statistical analysis in the permit. As written, the permit would require statistical analysis using data that cannot be reliably quantified, i.e. trace detections above the method detection limit (MDL) but below the practical quantitation limit (PQL). This issue has come up in previous permits at other Sanitation Districts' facilities. The Regional Board has included language clarifying that Minimum Levels (ML) and Reporting Levels (RL) could be viewed as functionally equivalent to the MDL and PQL to address this issue. The Sanitation Districts request the same language be included in the revised WDRs for Scholl Canyon Landfill. The Sanitation Districts request the following language be included as a new sub-section in the permit. *For the purposes of this MRP, Minimum Level (ML)[1] and Reporting Limit (RL)[2] are functionally equivalent to method detection limit (MDL) and practical quantitation limit (PQL) with regard to reporting and statistical evaluation requirements. For this purpose, MLs and RLs shall be derived by the laboratory for each analytical procedure, according to the SWRCB's Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (the State Implementation Policy or SIP) and the State of California's laboratory accreditation procedures. Sample results greater than or equal to the ML/RL shall be reported "as measured" by the laboratory. Sample results less than the ML/RL shall be reported as less than the numeric values of the ML/RL. Nominal ML and RL values shall be reported with all data. Correspondingly, any reference to "detections at or above the trace level" shall be substituted with "detections at or above the Minimum Level".* *[1] "Minimum Level" represents the lowest quantifiable concentration in a sample based upon the proper application of analytical procedures and the absence of any matrix interference. MLs also represent the lowest standard concentration on the calibration curve for a specific analytical technique after the application of appropriate method-specific factors.* *[2] "Reporting Limit" is the same as Minimum Level when there have been no modifications, such as dilution or concentration to the standard analytical procedure during sample preparation.*	The Board agrees with the comment. However, this issue arises only when the concentration of a pollutant cannot be reliably quantified. The following footnote is therefore added to the MRP under Section C.2.g to address the issue: *Whenever a chemical is detected at a concentration above the MDL but below the practical quantitation limit (PQL), the Minimum Level (ML), which is defined as the lowest quantifiable concentration in a sample based upon the proper application of analytical procedures and the absence of any matrix interference, shall be used.*	The requirement is modified in response to the comment.

No.	Comment	Response	Action Taken
2	**Regarding Provision E.4 of the WDRs** Provision E.4 of the WDRs requires top deck surfaces at the landfill to be constructed to achieve a minimum of three percent slope. In the current final fill plan included in the JTD (Section 7.3), the Sanitation Districts indicate that runoff is controlled by maintaining a minimum 2 percent slope. Title 27 Section 21090 (b)(1)(B) gives the RWQCB authority to allow portions of the final cover to be built with slopes less than three percent if the Discharger proposes effective systems for diverting surface drainage areas. The Sanitation Districts request that this provision be revised to indicate slopes less than three percent are permitted as follows: *The Landfill shall be designed, constructed, and maintained to prevent, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, and washout in compliance with Title 27 sections 20365 and 21090(b)(1) which could occur as a result of precipitation from a 100-year, 24-hour frequency storm. This shall be accomplished by, at a minimum, the following:* *a. Top deck surfaces shall be constructed to achieve a minimum of three percent slope, including structures which direct water to downdrains. The RWQCB can allow portions of the final cover to be built with slopes of less than three percent if the discharger proposes an effective system for diverting surface drainage in accordance with Title 27 Section 21090(b)(1)(B);* *b. Downdrains and other drainage structures must be constructed for all sideslopes as necessary; and* *c. All components of the Landfill drainage system must be designed and constructed to withstand site-specific maximum intensity precipitation (peak flow) from a 100-year, 24-hour storm.*	The Board agrees. Provision E.4.a of the tentative WDRs has been modified by adding the following: *a. Top deck surfaces shall be constructed to achieve a minimum of three percent slope, including structures which direct water to downdrains, unless an alternative has been approved by the Regional Water Board Executive Officer in accordance with Title 27 section 21090(b)(1)(B);*	The requirement is modified in response to the comment.

No.	Comment	Response	Action Taken
3	**Regarding Provision E (Requirements for Containment Systems) of the WDRs** Provision E of the WDRs includes requirements for containment systems at the landfill. As currently written, these provisions are overly broad and require approval from the Regional Board Executive Officer for "any containment structure" at the landfill. The Sanitation Districts request clarification that the requirements in Provision E, including Provisions E.1, E.3, E.7, E.11, E.12, and E.13, are intended only for future expansion and new construction of waste containment structures at the landfill per Title 27 Section 20320. Please consider inserting the following language as a new section in Provision E: *Requirement for containments systems in the following sections refer to future expansion and new construction of waste containment structures at the landfill in accordance with Title 27 Section 20320.*	The Board disagrees. Although, as an "existing unit" as defined in Section 20080(d) of Title 27, the Landfill is currently not required to have a liner and LCRS system, the construction of such a system may be required in the future. Furthermore, the Landfill's final cover system must be designed and constructed as required in this section.	No change is made in response to this comment.
4	**Regarding Provision F.6 (Requirements for Groundwater Monitoring) of WDRs** Provision F.6 of the WDRs requires all data to be generated by a laboratory accredited by the State of California Environmental Laboratory Accreditation Program (ELAP) for the analytical test methods used. ELAP certification is no longer provided for certain analytical test methods required by permits. The Sanitation Districts submitted a letter dated May 8, 2018 requesting approval to waive this requirement for those test methods for which ELAP certification is no longer available. The Sanitation Districts request that this provision be revised to indicate that the Regional Board Executive Officer can approve analytical test methods that are not available through ELAP as follows: *Data produced and reports submitted under the MRP must be generated by a laboratory accredited by the State of California Environmental Laboratory Accreditation Program (ELAP). The Regional Board Executive Officer may allow use of analytical methods that are not available through ELAP. For methods that are available through ELAP, the laboratory must hold a valid certificate of accreditation for the analytical test methods specified in the latest edition of the USEPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846) ~~promulgated~~, or equivalent analytical test methods validated for intended use and approved by the Regional Water Board Executive Officer. The laboratory must include quality assurance/quality control data in all laboratory reports. Data generated using field tests is exempt pursuant to CWC section 13176.*	The Board disagrees. Water Code section 13176 requires that the analysis of any material required by the Porter-Cologne Act be performed by a laboratory that is accredited by ELAP (excepting certain field testing). The Board Executive Officer does not have the authority to waive this requirement. However, the Board will consider the availability of ELAP accreditation for a constituent when determining compliance with this requirement.	The requirement is not modified in response to the comment.

No.	Comment	Response	Action Taken
5	**Regarding Section B.1 and B.2 of the MRP** Section B.1 and B.2 of the MRP require submittal of semi-annual monitoring reports by July 31 and January 31 of each year and an annual summary report by January 31 of each year. The Sanitation Districts anticipate additional time will be required to prepare these reports and request an extension of these deadlines. The Sanitation Districts request that these sections be revised to indicate these reports are due within two months of the end of the reporting period to February 28 and August 31 of each year as follows: 1. *Semi-Annual Monitoring Report* *A written monitoring report shall be submitted semi-annually by ~~July 31~~ August 31 (for the period from January 1 to June 30) and ~~January 31~~ February 28 (for the period from July 1 to December 31) of each year. Any reporting or tabulation requirements less than semi-annual in length (i.e., monthly or quarterly) shall be submitted in corresponding semi-annual reports. Semi-annual reports shall include, but shall not be limited to, the following items and sequence…* 2. *Annual Summary Report* *The Discharger shall submit an annual summary report to the Regional Water Board no later than ~~January 31~~ February 28 of each year covering the previous monitoring year, which starts January 1 and ends December 31. This report may be combined with the semi-annual report that is due on ~~January 31~~ February 28 of each year. The annual summary report shall include at least the following…*	The Board agrees.	The requirement is modified as requested.
6	**Regarding Section C.2.f of the MRP** Section C.2.f of the MRP requires the Sanitation Districts to conduct groundwater monitoring on a semi-annual basis in April and October each year and on an annual basis in October each year. Currently, the Sanitation Districts conduct groundwater sampling in February and August. In order to maintain consistency with the current sampling program and monitoring staff schedule, the Sanitation Districts requests that this semi-annual monitoring be changed to February and August each year and annual monitoring be changed to August of each year as follows: *f. Groundwater Quality Monitoring - The Discharger shall conduct the following groundwater monitoring activities at the Landfill:* *i. Semi-annual monitoring shall be conducted at all downgradient groundwater monitoring wells listed on Table A-1 and shall be analyzed for all indicator parameters and supplemental parameters on a semi-annual basis (in ~~April and October~~ February and August) and all other COCs on an annual basis (in ~~October~~ August).*	The Board agrees.	The requirement is modified as requested.

No.	Comment	Response	Action Taken
7	**Regarding Section C.2.m of the MRP** Section C.2.m of the MRP requires sampling and analysis of water used for irrigation and dust control, other than potable water. The Sanitation Districts request clarification that sampling and analysis is only required for wastewater sources that are reused onsite as follows: *Water Used on Site for Irrigation and ·Dust Control: The Discharger shall record the amount of water used on site for the purposes of irrigation and dust control from each source on a monthly basis. Each wastewater source that is used for irrigation and dust control, other than potable water and recycled water, shall be sampled quarterly and analyzed for pH, heavy metals, nitrate, total organic carbon, oil and grease, and VOCs.*	The Board agrees. However, "recycled water" shall mean recycled water that meets Title 22 of the California Code of Regulations. The requirement is revised as follow: *Water Used on Site for Irrigation and ·Dust Control: The Discharger shall record the amount of water used on site for the purposes of irrigation and dust control from each source on a monthly basis. Each wastewater source that is used for irrigation and dust control, other than potable water and recycled water that meets the standards of Title 22 of the California Code of Regulations, shall be sampled quarterly and analyzed for pH, heavy metals, nitrate, total organic carbon, oil and grease, and VOCs.*	The requirement is modified in response to the comment.
8	**Regarding Provision H.9 of the tentative WDRs** Provision H.9 of the WDRs requires a sampling station for each wastewater source where representative samples can be obtained. The Sanitation Districts request clarification that sampling stations are only required for those wastewater sources that are reused onsite. In addition, sampling requirements for wastewater sources that are reused on site are included in Section C.2.m of the MRP. The Sanitation Districts request the Regional Board consider revising this provision as follows: *A sampling station for each wastewater source to be reused onsite shall be established ~~for each wastewater source~~ at locations where representative samples can be obtained. Wastewater samples shall be obtained at sampling stations prior to being mixed with other sources of water. The minimum sampling frequency for wastewaters is in accordance with Section 2.C.m of the MRP. ~~on a quarterly basis for water used for dust control, irrigation or other onsite land applications, except for water purged from wells where the minimum sampling frequency shall be semi-annual.~~*	The Board agrees.	The requirement is modified as requested.

No.	Comment	Response	Action Taken
9	**Regarding Provision J.8 of the WDRs** Provision J.8 of the WDRs requires a detailed post-earthquake report be submitted to the Regional Board within seven days following the earthquake. The information that would be required for a detailed post-earthquake report, including corrective actions and implementation schedules, is not likely to be available within seven days following a significant earthquake. The Sanitation Districts request that deadline for a post-earthquake report be extended to a minimum of thirty days similar to Provision J.9 for other natural disasters as follows: *The Discharger shall contact the Regional Water Board within 48 hours of any significant earthquake event that has impacted the Landfill. A significant earthquake is herein defined as an earthquake event above Richter Magnitude 5.0 within a 100-kilometer radius of the property boundaries of the Landfill. A detailed post-earthquake report describing any physical damages to the containment features, groundwater monitoring and/or leachate control facilities, and a plan for corrective action, including implementation schedule, shall be submitted to the Regional Water Board within ~~seven~~ thirty days.*	The Board disagrees. This requirement has been included in WDRs for all municipal solid waste landfills in the Region. Following a major earthquake in the Region, the Board needs to assess damages quickly for disaster response and recovery efforts. A 7-day period is adequate for the operator to prepare a detailed post-earthquake report describing damages and a plan for corrective action for the Landfill.	The requirement has not been modified.
10	**Regarding Prohibition C.2 of the WDRs** Prohibition C.2 of the WDRs prohibits the discharge of waste from causing the pH of waters in the groundwater basin to fall below 6.5 or rise above 8.5. The Water Quality Control Plan for the Los Angeles Region (Basin Plan) contains regional objectives for pH in surface waters but does not contain regional objectives for pH in groundwaters. Based on existing groundwater monitoring at the landfill, the Sanitation Districts request that the Prohibition be revised as follows: *2. The discharge of waste shall not:* *a. cause the occurrence of coliform or pathogenic organisms in the groundwater basin;* *b. cause the occurrence of objectionable tastes or odors in the groundwater basin;* *c. cause waters pumped from a groundwater basin to foam;* *d. cause the presence of toxic materials in the groundwater basin;* *e. cause the pH of waters in the groundwater basin to fall below ~~6.5~~ 6.0, or rise above 8.5;* *f. cause the Regional Water Board's objectives for groundwater or surface waters as established in the Basin Plan to be exceeded; or* *g. cause pollution, contamination, or nuisance, as defined in CWC section 13050, or adversely affect beneficial uses of groundwater or surface waters as established in the Basin Plan.*	The Board agrees.	The requirement has been modified as requested.

No.	Comment	Response	Action Taken
11	**Regarding Section C.1 of the tentative MRP** Section C.1 of the MRP indicates the Sanitation Districts are required to conduct analytical monitoring of leachate and the vadose (unsaturated) zone at the Landfill. Currently, Scholl Canyon Landfill does not have a leachate collection and recovery system (LCRS). In addition, sampling of soil pore liquids from the vadose zone is not required. The existing permit states that vadose zone monitoring can be eliminated when undergoing a corrective action program. The Sanitation Districts request the Regional Board consider revising this section as follows: *1. Environmental Monitoring Networks* *The Discharger shall conduct analytical monitoring of groundwater~~,~~ and surface water~~, leachate, and the vadose (unsaturated) zone~~ at the Landfill. The current environmental monitoring points for the Landfill are summarized in Table A-1 and their locations are displayed on Figures A-1 and Figure A-2.*	The Board agrees.	The requirement is modified as requested.
12	**Regarding Table A-2 of the tentative MRP** Table A-2 of the MRP contains the list of required monitoring parameters for the site and includes "Carbon Dioxide, lab" under the list of Supplemental Parameters. "Total Alkalinity" is also included as a required monitoring parameter in the table and can serve as a surrogate for carbon dioxide. In addition, the analytical laboratory methods for carbon dioxide are not readily offered by most laboratories. Therefore, the Sanitation Districts request that the Regional Board consider removing "Carbon Dioxide, lab" from the required Supplemental Parameter list in the table as follows: ***Supplemental Parameters*** *Bicarbonate (as CaCO3)* *Boron, total* *Bromide* *Calcium, total* *~~Carbon dioxide, lab~~*	The Board agrees.	The requirement is modified as requested.

No.	Comment	Response	Action Taken
WDR-1	**Regarding Finding No. 16 of the tentative WDRs** The JTD indicates other potential uses for the Landfill after closure. Please revise as follows: *On August 30, 2018, the Discharger submitted to the Regional Water Board an updated JTD that includes revisions to the side slope and top deck final cover, landscaping, drainage and erosion control, landfill gas control, and monitoring systems. The updated JTD describes the existing and proposed operation, closure, and postclosure maintenance of the Landfill and is the operating document for the site. The JTD specifies that the postclosure land use of the entire Landfill will be devoted to park, recreation, and roadway purposes, or for the implementation of solid waste management alternatives or other facilities related to the operation of a sanitary landfill at the site.*	The Board agrees.	The finding is modified as requested.
WDR-2	**Regarding Finding No. 31 of the tentative WDRs** As of approximately 2002, treatment and onsite reuse of extracted groundwater from the barrier wells and Sump 2 was stopped. All water is untreated and discharged to the City of Glendale sewer system pursuant to the IW permits. Please consider the following revision: ~~*Extracted groundwater at the Landfill is processed in two air-stripping systems. One of thetreatment systems is for processing water extracted from the toe barrier, known as the Canyon Water Treatment Facility, and is located along the south side of the Facility. The othertreatment system is for processing water extracted from Sump 2, known as the Sump 2 Treatment Facility, and is located along at the southeast end of the Facility. Varying portions of the treated water is reused for dust control as needed, subject to the requirements ofSection H (Requirements for Onsite Water Use) of this Order. The remaining treated water is discharged to the City's sanitary sewer system pursuant to City of Glendale Industrial Waste Discharge Permit No. W-3835, issued on January 1, 2011.*~~ *Extracted groundwater from the toe barrier at the Landfill is discharged to the City of Glendale's sanitary sewer system pursuant to Industrial Waste Discharge Permit No. W-3835, which became effective January 1, 2017. Extracted groundwater from Sump 2 at the Landfill is discharged to the City's sanitary sewer system pursuant to Industrial Waste Discharge Permit No. W-2762, which became effective January 1, 2017. Extracted groundwater is not reused at the Landfill.*	The Board agrees. Finding No. 31 of the WDRs has been revised to: *Since 2002, extracted groundwater at the Landfill has been discharged to the City of Glendale's sanitary sewer system pursuant to industrial waste discharge permits issued by the City. Currently, extracted groundwater from the toe barrier is discharged pursuant to Industrial Waste Discharge Permit No. W-3835, while extracted groundwater from Sump 2 is discharged pursuant to Industrial Waste Discharge Permit No. W-2762. Both permits became effective January 1, 2017. Extracted groundwater is not reused at the Landfill.*	The finding is modified in response to the comment.

No.	Comment	Response	Action Taken
WDR-3	**Regarding Finding No. 33 of the tentative WDRs** The discussion in the finding does not represent the current operating status of the site. Please consider revising as follows: *In 1987, to limit offsite water quality impacts, a leachate barrier and collection system (toe barrier) was installed at the western toe of the Facility in Scholl Canyon Park (Figure 7). The purpose of the toe barrier system was to capture leachate and prevent its seepage along the canyon alluvium and uppermost weathered bedrock. The main elements of this system are: 1) a subsurface cement and bentonite barrier keyed at least five feet into competent bedrock and extending across the canyon mouth; 2) a series of extraction wells with dedicated pumps installed on the Landfill side of the barrier; and 3) a pump house for pumping the extracted water to the City of Glendale sewer system pursuant to City of Glendale Industrial Wastewater Discharge Permit No. W-3835. ~~top deck area; 4) and an air-stripping system located on the top deck area.~~*	The Board agrees.	The finding is modified as requested.
WDR-4	**Regarding Finding No. 35 of the tentative WDRs** In March 2017 the Sanitation Districts completed installation of one additional groundwater extraction well (EW3R) at Barrier 1 (JTD Section 5.4). Please consider revising as follows: *In March of 1997, the Discharger submitted a proposed Corrective Action Program (CAP) because of VOCs detected in monitoring wells down gradient of the toe barrier. The CAP included five groundwater extraction wells (EW1B, EW2B, EW3B, EW4B, and EW5B) installed into bedrock. One additional groundwater extraction well (EW3R) was installed in March of 2017.*	The Board agrees.	The finding is modified as requested.

No.	Comment	Response	Action Taken
WDR-5	**Regarding Provision C.2.e of the tentative WDRs** The LA Basin Plan contains regional objectives for surface waters for pH which require that "*The pH of inland surface waters shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges. Ambient pH levels shall not be changed more than 0.5 units from natural conditions as a result of waste discharge.* The LA Basin Plan does not contain Regional Objectives for groundwaters for pH. Regional objectives for groundwater in the Santa Ana Basin Plan require that the pH of groundwater not be raised above 9 or depressed below 6. Based on groundwater monitoring at SCLF, please consider the following revision: *2. The discharge of waste shall not:* *a. cause the occurrence of coliform or pathogenic organisms in the groundwater basin;* *b. cause the occurrence of objectionable tastes or odors in the groundwater basin;* *c. cause waters pumped from a groundwater basin to foam;* *d. cause the presence of toxic materials in the groundwater basin;* *e. cause the pH of waters in the groundwater basin to fall below ~~6.5~~ 6.0, or rise above 8.5;* *f. cause the Regional Water Board's objectives for groundwater or surface waters as established in the Basin Plan to be exceeded; or* *g. cause pollution, contamination, or nuisance, as defined in CWC section 13050, or adversely affect beneficial uses of groundwater or surface waters as established in the Basin Plan.*	See response to Comment No. 10.	
WDR-6	**Regarding Provision D.2 of the WDRs** The Sanitation Districts currently report the quantities and types of hazardous wastes, medical wastes, or otherwise prohibited wastes recovered through the Waste Checking Program in the monthly solid waste facility operating report submitted to the Department of Public Health (LEA) and reports the source (if known), type, estimated amount and final disposition of unacceptable waste in the SCLF quarterly monitoring reports in accordance with Section II.B.8 of the SCLF MRP. Please clarify that the Sanitation Districts' practice is acceptable and that the intent of this provision is to require reporting only of any relocation of hazardous wastes that have been placed and covered within the landfill within seven (7) days.	The 7-day notification requirements in Provision D.2 of the tentative WDRs is applicable when the Discharger determines that hazardous wastes have been discharged at the Landfill and excavation and relocation of the such wastes are necessary. For hazardous wastes recovered through the Waste Checking Program during normal landfill operations, the Discharger's current practice is acceptable.	No changes to the tentative WDRs are necessary.

No.	Comment	Response	Action Taken
WDR-7	**Regarding Provision D.3 of the tentative WDRs** SCLF collects stormwater runoff from the active disposal area in a lined contact water basin that is discharged to the sanitary sewer rather than discharging offsite as runoff. Please consider revising this section to clearly indicate runoff is directed to stormwater control facilities at the landfill as follows: *The Landfill shall be graded and maintained to promote runoff of precipitation to the stormwater control facilities and to prevent ponding of liquids and surface water. Erosion or washout of refuse or cover materials by surface flows shall be controlled to prevent offsite migration.*	The Board agrees.	The provision is modified as requested.
WDR-8	**Regarding Provision D.8 of the tentative WDRs** The SCLF does not currently have a LCRS system. Recommend deleting this provision. ~~*The Discharger shall intercept and remove any liquid detected in a Landfill LCRS to a legal point of disposal, or as specified in these WDRs, unless it is otherwise approved by the Regional Water Board Executive Officer. If any liquid is determined to be hazardous, a licensed hazardous waste hauler shall transport all such liquid to an approved treatment and disposal facility.*~~	Although the Landfill does not have a LCRS, it does produce landfill liquids, including gas condensate and contaminated groundwater extracted downgradient of the Landfill that needs to be handled properly. For clarification, the provision is modified as following: *The Discharger shall intercept and remove any gas condensate and contaminated groundwater to a legal point of disposal, or as specified in these WDRs, unless it is otherwise approved by the Regional Water Board Executive Officer. If any liquid is determined to be hazardous, a licensed hazardous waste hauler shall transport all such liquid to an approved treatment and disposal facility.*	The provision is modified for clarification.
WDR-9	**Regarding Provision D.9 of the tentative WDRs** Section B.3 of the MRP contains requirements for contingency response for leachate seep from the Landfill. The MRP does not specify monitoring parameters and requires reporting within 24 hours. Please consider revising this section to refer monitoring requirements to the MRP as follows: *In any area within the Landfill where a natural spring or seep is observed, provisions shall be made and/or facilities shall be provided to ensure that this water will not come in contact with refuse in the Landfill. The locations of all springs and seeps found prior to, during, or after placement of waste material that could affect the Landfill shall be reported to the Regional Water Board in accordance with the MRP ~~semiannually~~. ~~The Discharger shall monitor seepage for the monitoring parameters identified in the MRP (No. CI-2846).~~*	The Board agrees.	The provision is modified as requested.

No.	Comment	Response	Action Taken
WDR-10	**Regarding Provision E of the tentative WDRs** Provision E of the WDRs includes requirements for containment systems at the landfill. As currently written, these provisions are overly broad and require approval from the Regional Board Executive officer for "any containment structure" at the landfill. The Sanitation Districts request clarification that the requirements in Provision E, including Provisions E.1, E.3, E.7, E.11, E.12, and E.13, are intended only for future expansion and new construction of waste containment structures at the landfill per Title 27 Section 20320. Please consider inserting the following language in this section: *Requirements for containment systems in the following sections refer to future expansion and new construction of waste containment structures at the landfill in accordance with Title 27 Section 20320.*	See response to Comment No. 3.	
WDR-11	**Regarding Provision E. 4 of the tentative WDRs** Title 27 Section 21090 (b)(1)(B) gives the RWQCB authority to allow portions of the final cover to be built with slopes less than three percent if the Discharger proposes effective systems for diverting surface drainage areas. In the current final fill plan included in the JTD (Section 7.3), the Sanitation Districts indicate that runoff is controlled by maintaining minimum 2 percent slope. Please consider revising the provision as follows: *The Landfill shall be designed, constructed, and maintained to prevent, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, and washout in compliance with Title 27 sections 20365 and 21090(b)(1) which could occur as a result of precipitation from a 100-year, 24-hour frequency storm. This shall be accomplished by, at a minimum, the following:* *a. Top deck surfaces shall be constructed to achieve a minimum of three percent slope, including structures which direct water to downdrains. The RWQCB can allow portions of the final cover to be built with slopes of less than three percent if the discharger proposes an effective system for diverting surface drainage in accordance with Title 27 Section 21090(b)(1)(B);* *b. Downdrains and other drainage structures must be constructed for all sideslopes as necessary; and* *c. All components of the Landfill drainage system must be designed and constructed to withstand site-specific maximum intensity precipitation (peak flow) from a 100-year,* 24-hour storm.	See response to Comment No. 2.	

No.	Comment	Response	Action Taken
WDR-12	**Regarding Provision E. 14 of the tentative WDRs** The landfill does not have an LCRS. This is a monitoring requirement (for future LCRS, if any) that should be specified in the MRP. Please consider revising the provision as follows: *The Discharger shall perform ~~an annual~~ testing per Title 27 section 20340(d) and in accordance with the MRP of all LCRS(s) to demonstrate their operating efficiency during the operational, closure and postclosure maintenance periods of the Landfill.*	The Board agrees.	The provision is modified as requested.
WDR-13	**Regarding Provision F.6 of the tentative WDRs** ELAP certification is no longer provided for certain analytical test methods required by permits. The Sanitation Districts have submitted a letter requesting approval to waive this requirement for those test methods. Please consider revising the provision as follows: *Data produced and reports submitted under the MRP must be generated by a laboratory accredited by the State of California Environmental Laboratory Accreditation Program (ELAP).* The provision is modified as requested. *For methods that are available through ELAP, the laboratory must hold a valid certificate of accreditation for the analytical test methods specified in the latest edition of the USEPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846) ~~promulgated~~, or equivalent analytical test methods validated for intended use and approved by the Regional Water Board Executive Officer. The laboratory must include quality assurance/quality control data in all laboratory reports. Data generated using field tests is exempt pursuant to CWC section 13176.*	See response to Comment No. 4.	
WDR-14	**Regarding Provision H.9 of the tentative WDRs** It is our understanding that sampling is only required for wastewater reused onsite. Sampling requirements for wastewater reused onsite are already included in section C.2.m of the MRP. The Sanitation Districts also request that the provision be revised to clarify that sampling of recycled water reused on site is not required. Please consider revising the provision as follows: *A sampling station for each wastewater source to be reused onsite, other than recycled water, shall be established ~~for each wastewater source~~ at locations where representative samples can be obtained. Wastewater samples shall be obtained at sampling stations prior to being mixed with other sources of water. The minimum sampling frequency for wastewaters is in accordance with Section C.2.m of the MRP. ~~on a quarterly basis for water used for dust control, irrigation or other onsite land applications, except for water purged from wells where the minimum sampling frequency shall be semi-annual~~.*	The Board agrees.	The provision is modified as requested.

No.	Comment	Response	Action Taken
WDR-15	**Regarding Provision J.4 of the tentative WDRs** Since operation of the landfill requires a significant number of staff with varying backgrounds, including temporary staff, the requirement to "ensure" that all staff are familiar with content at all times may not be feasible. The Sanitation Districts request that this provision be revised as follows: *The Discharger shall maintain a copy of this Order at its local offices and shall ensure that ~~all site-operating personnel are familiar with its content and that~~ it is available to operating personnel at all times.*	*The Provision is modified as following to address the Discharger's concern:* *The Discharger shall maintain a copy of this Order at its local offices and shall ensure that at a minimum all supervisory site-operating personnel are familiar with its content and that it is available to operating personnel at all times.*	Revision made in response to the comment.
WDR-16	**Regarding Provision J.8 of the tentative WDRs** The information that would be required for a detailed post-earthquake report, including corrective actions and implementation schedules, is not likely to be available within seven days following a significant earthquake. The Sanitation Districts request that deadline for a post-earthquake report be extended to a minimum of thirty days similar to Provision J.9 for other natural disasters. Please revise as follows: *The Discharger shall contact the Regional Water Board within 48 hours of any significant earthquake event that has impacted the Landfill. A significant earthquake is herein defined as an earthquake event above Richter Magnitude 5.0 within a 100-kilometer radius of the property boundaries of the Landfill. A detailed post-earthquake report describing any physical damages to the containment features, groundwater monitoring and/or leachate control facilities, and a plan for corrective action, including implementation schedule, shall be submitted to the Regional Water Board within ~~seven~~ thirty days.*	See response to Comment No. 9	
MRP-1	**Regarding Section B.1. of the tentative MRP** As discussed, the Sanitation Districts request an extension of the deadline for submitting semi-annual and annual monitoring reports to the end of February and August each year. *Semi-Annual Monitoring Report* *A written monitoring report shall be submitted semi-annually by August 31 ~~July 31~~ (for the period from January 1 to June 30) and February 28 ~~January 31~~ (for the period from July 1 to December 31) of each year. Any reporting or tabulation requirements less than semi-annual in length (i.e., monthly or quarterly) shall be submitted in corresponding semi-annual reports. Semi-annual reports shall include, but shall not be limited to, the following items and sequence:*	See response to Comment No. 5	

No.	Comment	Response	Action Taken
MRP-2	**Regarding Section B.2. of the tentative MRP** As discussed, the Sanitation Districts request an extension of the deadline for submitting semi-annual and annual monitoring reports to the end of February and August each year. *The Discharger shall submit an annual summary report to the Regional Water Board no later than February 28 ~~January 31~~ of each year covering the previous monitoring year, which starts January 1 and ends December 31. This report may be combined with the semi-annual report that is due on February 28 ~~January 31~~ of each year. The annual summary report shall include at least the following:*	See response to Comment No. 5	
MRP-3	**Regarding Section C.1 of the tentative MRP** SCLF does not currently have an LCRS. Please delete the reference to leachate. Also, soil pore liquid monitoring of the vadose zone is not required at the landfill. The existing SCLF permit indicates "*Vadose zone monitoring may be eliminated when undergoing a corrective action program*". *Please consider the following revisions:* *1. Environmental Monitoring Networks* *The Discharger shall conduct analytical monitoring of groundwater, and surface water~~, leachate, and the vadose (unsaturated) zone~~ at the Landfill. The current environmental monitoring points for the Landfill are summarized in Table A-1 and their locations are displayed on Figure~~s~~ A-1 and Figure A-2.*	See response to Comment No. 11	
MRP-4	**Regarding Section C.2.b of the tentative MRP** Deleting the phrase "*all Appendix II constituents that have been detected and confirmed in the leachate scan required by this MRP"* in the requirements, as the Landfill does not have a LCRS.	The Board agrees.	The requirement is modified as requested.
MRP-5	**Regarding Section C.2.c.iii of the tentative MRP** Modify the requirement as following, as the Landfill does not have a LCRS. "*iii. Other COCs: These include trace metals or other pollutants that have been detected and confirmed ~~to be in leachate from the Landfill~~ pursuant to Section C.2.b of this MRP or added by the Regional Board Executive Officer.*"	The Board agrees.	The requirement is modified as requested.

No.	Comment	Response	Action Taken
MRP-6	**Regarding Section C.2.f of the tentative MRP** Currently, SCLF conducts groundwater sampling during the months of February and August. In order to maintain consistency with current sampling program, the Sanitation Districts request semi-annual sampling be changed to February and August and annual sampling to August. Please consider the following revision: *f. Groundwater Quality Monitoring - The Discharger shall conduct the following groundwater monitoring activities at the Landfill:* *i. Semi-annual monitoring shall be conducted at all downgradient groundwater monitoring wells listed on Table A-1 and shall be analyzed for all indicator parameters and supplemental parameters on a semi-annual basis (in February and August ~~April and October~~) and all other COCs on an annual basis (in August ~~October~~).*	See response to Comment No. 6	
MRP-7	**Regarding Section C.2.g of the tentative MRP** The Sanitation Districts request the following language be incorporated into the MRP. *For the purposes of this MRP, Minimum Level (ML)[1] and Reporting Limit (RL)[2] are functionally equivalent to method detection limit (MDL) and practical quantitation limit (PQL) with regard to reporting and statistical evaluation requirements. For this purpose, MLs and RLs shall be derived by the laboratory for each analytical procedure, according to the SWRCB's Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (the State Implementation Policy or SIP) and the State of California's laboratory accreditation procedures. Sample results greater than or equal to the ML/RL shall be reported "as measured" by the laboratory. Sample results less than the ML/RL shall be reported as less than the numeric values of the ML/RL. Nominal ML and RL values shall be reported with all data. Correspondingly, any reference to "detections at or above the trace level" shall be substituted with "detections at or above the Minimum Level".* *[1] "Minimum Level" represents the lowest quantifiable concentration in a sample based upon the proper application of analytical procedures and the absence of any matrix interference. MLs also represent the lowest standard concentration on the calibration curve for a specific analytical technique after the application of appropriate method-specific factors.* *[2] "Reporting Limit" is the same as Minimum Level when there have been no modifications, such as dilution or concentration to the standard analytical procedure during sample preparation.*	See response to Comment No. 1	

No.	Comment	Response	Action Taken
MRP-8	**Regarding Section C.2.h.ii.A of the tentative MRP** Please clarify that sampling is not required within the 10 day period within 90 to 100 days of the initial sampling. *In the event that the Discharger concludes (pursuant to Section C.2.h.i.B) that there is a preliminary indication that a given MPar has a measurably significant increase at a given well, then the Discharger shall immediately notify Regional Board staff by phone, fax, or e-mail and, within 30 days of such indication, shall collect two new (re-test) samples from the indicating compliance well. To maintain sample independence, the retest sampling shall be conducted within 90 ~~to 100~~ days of the initial sampling event.*	The Board agrees.	The requirement is modified as requested.
MRP-9	**Regarding Section C.2.i of the tentative MRP** The Sanitation Districts request that this section of the MRP be changed to require semi-annual water level measurements instead of quarterly in order to maintain consistency with groundwater monitoring requirements in Section C.2.f of the MRP. The Sanitation Districts request that the Regional Board considering changing this section as follows: *Groundwater Flow Direction - the Discharger shall measure the water level in each well listed in Table A-1 at least semi-annually ~~quarterly~~ and determine the presence of horizontal and vertical gradients and groundwater flow rate and direction for the respective groundwater body. The Discharger shall determine groundwater flow direction by water level readings monitoring wells listed in Table A-1.*	The Board agrees.	The requirement is modified as requested.
MRP-10	**Regarding Section C.2.j of the tentative MRP** SCLF does not have an LCRS. The Sanitation Districts request that the Regional Board consider removing this section.	The Board agrees.	The requirement is modified as requested.

No.	Comment	Response	Action Taken
MRP-11	**Regarding Section C.2.m of the tentative MRP** The Sanitation Districts request that the Regional Board clarify this section of the MRP to clearly indicate that sampling is only required for wastewater reused onsite for irrigation and dust control as discussed in Provisions H.8 and H.9 of the WDRs. The Sanitation Districts also request that the Regional Board clarify that sampling for recycled water reused onsite is not required. *Water Used on Site for Irrigation and Dust Control: The Discharger shall record the amount of water used on site for the purposes of irrigation and dust control from each source on a monthly basis. Each wastewater source used for irrigation and dust control, other than potable water and recycled water, shall be sampled quarterly and analyzed for pH, heavy metals, nitrate, total organic carbon, oil and grease, and VOCs.*	See response to Comment No. 7.	
MRP-12	**Regarding Section D.1 of the tentative MRP** Please refer to the comment for Provision F.6 of the WDRs above. ELAP certification is no longer provided for certain analytical test methods required by permits. The Sanitation Districts have submitted a letter requesting approval to waive this requirement for those test methods. The Sanitation Districts request that the Regional Board consider revising this section as follows: *Sample collection, storage, and analysis shall be performed according to the most recent version of Standard USEPA Methods (USEPA publication "SW-846") and in accordance with a sampling and analysis plan acceptable to the Regional Water Board Executive Officer. A State of California approved laboratory, accredited by the State of California Environmental Laboratory Accreditation Program (ELAP), shall perform water analysis. The Regional Board Executive Officer may allow use of analytical methods that are not available through ELAP. Specific methods of analysis must be identified. The director of the laboratory whose name appears on the certification shall supervise all analytical work in his/her laboratory and shall sign reports of such work submitted to the Regional Water Board. In addition, the Discharger is responsible for seeing that the laboratory analysis of samples from all monitoring points meets the following restrictions:*	See response to Comment No. 4.	The requirement is modified as requested.

No.	Comment	Response	Action Taken
MRP-13	**Regarding Section D.1.d of the tentative MRP** The Sanitation Districts request that this section be changed to remove the requirement for a signed explanation for every MDL or PQL change. Going forward, the Sanitation Districts' laboratory is required to verify MDLs quarterly and re-calculate MDLs annually. The PQL is interpreted as being equivalent to the RL. Changes to RLs occur frequently when samples are diluted or insufficient sample volume is provided to the laboratory. The requirement for a signed explanation for every MDL and PQL change will generate a lot of additional administrative work for the laboratory. The Sanitation Districts request that the Regional Board consider revising this requirement as follows: *For each MPar addressed during a given reporting period, the Discharger shall include in the monitoring report a listing of the prevailing MDL and PQL for that MPar together with an indication as to whether the MDL has, ~~PQL, or both have~~ changed since the prior reporting period. The Discharger shall require the analytical laboratory to report censored data (trace level and non-detect determinations). In the event that an MPar's MDL changes ~~and/or PQL change~~, the Discharger shall include ~~highlight~~ that change in the report's summary ~~and the report shall include an explanation for the change that is written and signed by the owner/director of the analytical laboratory~~.*	The Board agrees.	The requirement is modified as requested.
MRP-14	**Regarding Table A-2 of the tentative MRP** Other COCs are identified as any other pollutants detected and confirmed in the Landfill leachate or added by the Regional Water Board Executive Officer. SCLF does not have an LCRS and therefore does not monitoring any parameters in Landfill leachate. The Sanitation Districts request that the Regional Board consider revising this section as follows: *Any other pollutants detected and confirmed in accordance with Section C.2.f.ii of the MRP ~~the Landfill leachate~~ or added by the Regional Water Board Executive Officer*	The Board agrees.	The requirement is modified as requested.
MRP-15	**Regarding Table A-2 of the tentative MRP** Sodium is included as sampling parameter in both the Inorganic Parameter and Supplemental Parameters lists. The Sanitation Districts request "Sodium" be removed from the Inorganic Parameters list.	The Board agrees that the parameter should not be in both lists. However, we believe that sodium be better kept in the Inorganic Parameter list and deleted from Supplemental Parameters list.	The requirement is modified in response to the comment.

No.	Comment	Response	Action Taken
MRP-16	**Regarding Table A-2 of the tentative MRP** Analysis for Dichlorobenzene consists of three isomers, 1,2- dichlorobenzene; 1,3-dichlorobenzene; and 1,4- dichlorobenzene. 1,2-dichlorobenzene is listed separately in this section. Please clarify if total dichlorobenzene (sum of these isomers) is required. Please consider revising as follows:<br~~Dichlorodbenzene~~ Dichlorobenzene, total.	The Board agrees.	The requirement is modified as requested.
MRP-17	**Regarding Table A-2 of the tentative MRP** Total alkalinity is required under the Inorganic Parameters for the site and can serve as a surrogate for carbon dioxide. In addition, the analytical laboratory methods for carbon dioxide are not readily offered by laboratories. The Sanitation Districts requests "Carbon Dioxide, lab" be removed from the table. ***Supplemental Parameters:*** *Bicarbonate (as CaCO3)* *Boron, total* *Bromide* *Calcium, total* ~~*Carbon dioxide, lab*~~	See response to Comment No. 12.	

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

ORDER NO. R4-2019-0XXX

WASTE DISCHARGE REQUIREMENTS

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY
SCHOLL CANYON LANDFILL
(FILE NO. 60-117)

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The California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) finds:

BACKGROUND

1. The Scholl Canyon Landfill (Landfill) is a Class III municipal solid waste (MSW) landfill located at 3001 Scholl Canyon Road, Glendale, California (Figure 1). The Landfill is owned by both the City of Glendale (City) and the County of Los Angeles (County) and is operated by the County Sanitation Districts of Los Angeles County (Discharger) pursuant to a Joint Powers Agreement between the City, the County, and the Discharger on land owned by the City, the County, and Southern California Edison (SCE). The Landfill is centered at approximate latitude 34°09'24" N and longitude 118°11'35" W.

2. The Landfill is within a 535-acre waste management facility (Facility), of which 440 acres are designated for landfill operations. The Facility includes two portions: the active landfill in the Scholl Canyon area that encompass approximately 314 acres, and an inactive landfill in the Northern Canyon area that encompasses approximately 126 acres (Figure 2).

3. The Landfill started operations in 1961 in Scholl Canyon and subsequently moved to the adjacent Northern Canyon. When landfilling in the Northern Canyon neared completion, landfill operations resumed in Scholl Canyon. Filling in Northern Canyon was completed in 1970. The placement of a final cover consisting of two to four feet of clean soil was completed in June 1975. On June 7, 1976, the Discharger surrendered the closed Northern Canyon landfill to the City. Between 1988 and 1990, the City placed an additional six feet of soil over the Northern Canyon final cover as part of post-closure maintenance. Subsequently, the City developed the Northern Canyon with recreational facilities consisting of a golf course and a tennis complex. Since 1975, landfilling has only occurred in the Scholl Canyon portion of the Landfill.

REGULATORY HISTORY

4. On December 8, 1960, the Regional Water Board adopted Resolution No. 60-74, prescribing Waste Discharge Requirements (WDRs) to the Discharger for the disposal of nonhazardous solid and inert waste at the Landfill.

5. On October 24, 1988, the Regional Water Board adopted Order No. 88-112 revising the WDRs for the Landfill to include updates to the monitoring and reporting program (MRP No. CI-2846) that included groundwater monitoring. Order No. 88-112 terminated Order No. 60-74.

6. On January 17, 1990, the Regional Water Board issued an amended MRP for the Landfill that included revised groundwater quality indicator requirements for reporting a statistically significant increase in excess of water quality standards or background concentrations and duplicate sample requirements.

7. The federal Solid Waste Disposal Act (SWDA), as amended by the Resource Conservation and Recovery Act (RCRA), authorized the development of nationwide standards for disposal sites for MSW landfills (SWDA §§ 1007, 4004, 42 USC §§ 6907, 6944). On October 9, 1991, the United States Environmental Protection Agency (USEPA) promulgated regulations for MSW disposal facilities (40 CFR Parts 257 and 258; Federal MSW Regulations). The Federal MSW Regulations became effective on October 9, 1993 and established requirements addressing location restriction, facility operation and design criteria, groundwater monitoring and corrective action, closure and postclosure maintenance, and financial assurance. The Federal MSW Regulations require states to implement a permit program, or other system, to ensure MSW landfills comply with the Federal Landfill Regulations. (SWDA §§ 4003, 4005; 42 USC §§ 6943, 6945). Permit programs must be approved by USEPA. Approved permit programs are authorized to allow engineered alternatives to certain standards in the Federal MSW Regulations provided that the alternative meets applicable conditions and performance standards. (40 CFR § 256.21, and as applicable § 258.4) The California State Water Resources Control Board (State Water Board) Policy for Regulation of Discharges of Municipal Solid Waste (Resolution No. 93-62) requires the regional water boards to implement applicable provisions of the Federal MSW Regulations in WDRs. Regional Water Board Order No. 93-062, also known as the Super Order, which amended Order No. 88-112 among other WDRs applicable to MSW landfills, was adopted on September 27, 1993. Applicable requirements in the Super Order are incorporated into WDRs for specific landfills when such WDRs are revised.

8. In accordance with 40 CFR Part 258.40, all new MSW landfill units and lateral expansions of existing MSW landfills must be equipped with a liner and leachate collection and removal system (LCRS). The Landfill is an "existing MSWLF unit" as defined in 40 CFR section 258.2 and is not equipped with a liner and LCRS. To date, no MSW has been placed beyond the October 9, 1993 limits of the Landfill and there has not been a lateral expansion of the Landfill beyond the October 9, 1993 limits of the Landfill (the effective date of the federal regulations requiring liners and LCRSs). Any future lateral expansion of the Landfill will be required to have a liner and LCRS.

9. On September 19, 2001, the Regional Water Board adopted Order No. 01-132 to revise the WDRs for the Landfill to reflect changes in site conditions and to include requirements consistent with Title 27 of the California Code of Regulations (CCR) pertaining to MSW landfills (Title 27). Order No. 01-0132 terminated Order No. 88-112 as amended by Order No. 93-62.

10. On March 3, 2011, the Regional Water Board adopted Order No. R4-2011-0052 to establish requirements for the disposal or onsite use of non-designated/non-hazardous contaminated soils at MSW landfills in the Los Angeles Region, including the Landfill. Order No. R4-2011-0052 requires specific procedures for acceptance, disposal, and onsite use of contaminated soils and related wastes, and expanded storm water monitoring requirements to protect the quality of waters of the State.

11. The operation at the Facility is in accordance with a Land Use Variance (Case No. 6668-U) granted by the City to the Discharger on November 27, 1978. As of September 2018, the estimated remaining Landfill capacity under the existing Use Variance and fill plan is approximately 3.4 million tons, or 7.1 million cubic yards, including daily, intermediate, and final cover materials.

12. The Landfill is regulated under Solid Waste Facility Permit (SWFP) No. 19-AA-0012 (most recently issued on December 13, 2011) issued by the California Department of Resources Recycling and Recovery (CalRecycle, formerly California Integrated Waste Management Board, or CIWMB). The SWFP limits daily disposal to 3,400 tons per day of general non-hazardous solid waste. The Facility currently accepts approximately 1,271 tons of MSW per day. Based on the current average daily tonnage, the Discharger projects that final closure of the Landfill will occur in 2027.

13. On May 1, 2017, the Discharger submitted a Joint Technical Document (JTD) to CalRecycle for the renewal of the SWFP for the Landfill. The JTD includes descriptions of the environmental setting, existing facilities, design, environmental control systems, stability analyses, facility operations, permit requirements, construction quality standards, preliminary postclosure maintenance, and closure and postclosure maintenance cost estimates.

14. On July 22, 2017, the Discharger submitted to the Regional Water Board a letter titled *Scholl Canyon Alternative Final Cover Study Report* (Report) that transmitted two documents that are titled *Geotechnical Characterization of the Currently Installed Final Cover at Scholl Canyon Landfill* and *Hydrologic Modeling of Currently Installed Final Cover Performance at the Scholl Canyon Landfill*, respectively. The Report was submitted to characterize approximately 80 acres of interim cover placed on side slopes and a portion of the Landfill (Figure 3) that had reached the permitted maximum elevation, and to evaluate its suitability as an alternative to the prescriptive final cover specified in section 21090(a) of Title 27. In response, on October 30, 2017, the Regional Water Board issued a letter to the Discharger requesting the submittal of a final or partial final closure plan for those areas that meet all applicable regulations, including Sections 21090 and 21769 of Title 27.

15. On August 30, 2018, the Discharger submitted a report titled *Partial Final Closure Plan for Side Slope Areas at the Scholl Canyon Landfill* (PFCP), dated July 2018. The PFCP characterizes the interim soil cover that has been placed over approximately 80 acres of the Landfill side slopes for its suitability to serve as final cover and proposes the construction of final cover on approximately 45 acres of slopes in the future. The proposed side-slope final cover under the PFCP is an evapotranspirative (ET) cover constructed as a compacted monolithic layer using on-site and imported earthen materials. The completed side-slope final cover will continue to be part of the active Landfill site. The Discharger will maintain the slopes

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as part of normal landfilling operations under a side-slope inspection and maintenance program. On January 31, 2019, the Regional Water Board conditionally approved the PFCP.

16. On August 30, 2018, the Discharger submitted to the Regional Water Board an updated JTD that includes revisions to the side slope and top deck final cover, landscaping, drainage and erosion control, landfill gas control, and monitoring systems. The updated JTD describes the existing and proposed operation, closure, and postclosure maintenance of the Landfill and is the operating document for the site. The JTD specifies that the postclosure land use of the entire Landfill will be devoted to park, recreation, and roadway purposes, and/or for the implementation of solid waste management alternatives or other facilities related to sanitary landfill operations.

17. On February 14, 2019, the Northern Canyon portion of the Landfill ~~will be~~was enrolled into the Regional Water Board's General WDRs (Order No. R4-2002-022) that were adopted on January 24, 2002, for postclosure maintenance of closed, abandoned, or inactive (CAI) landfills in the Region.

18. California Water Code (CWC) section 13263 (e) provides that all WDRs shall be reviewed periodically and, upon such review, may be revised by the Regional Water Board to comply with changing state or federal laws, regulations, policies, or guidelines. This Order revises the WDRs for the Landfill to include updated requirements and describe current site conditions.

ENVIRONMENTAL SETTING

19. The Landfill is located in the San Rafael Hills in Glendale, California, just north of the Ventura Freeway (Highway 134). Topography prior to the development of the Landfill was characterized by steep-sided canyons and narrow ridges.

20. Geologic units at the Landfill site include igneous and metamorphic rocks of an undetermined depth, which are covered by varying amounts of fill, alluvium, and colluvium. The alluvium averages 14 to 35 feet in thickness. The colluvium averages two to three feet in thickness and is generally restricted to the ridges at the Facility. The bedrock material is highly fractured and weathered near the surface; however, fracture filling may have reduced the permeability of the near surface bedrock. A 1984 study by Converse Consultants identified three predominant fracture sets. The major set strikes east-west, and two lesser sets strike north-south and northwest-southeast.

21. Surface elevations in the area in which landfilling operations presently occur are at approximately 1,400 to 1,475 feet above mean sea level (MSL). Maximum elevation of the Landfill will be approximately 1,525 feet MSL. The final contours will tie into surrounding ridges on three sides and will slope down-canyon to the west.

22. Numerous relatively small-scale faults and shears have been mapped or observed onsite, showing displacements of several feet to tens of feet. There are no known active faults within 200 feet of the Facility as determined using California Division of Mines and Geology Guidelines No. 37, 43, and 44. Active faults are defined as Holocene epoch faults that have exhibited surface movement in the last 11,000 years. A potentially active fault, the Raymond

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Hill Fault, which strikes east-west and is located approximately one-half mile south of the Facility.

23. A significant shear/fault zone is located in the northeast portion of the Facility. The zone strikes northwest and dips to the northeast. Low permeability gouge material has created a groundwater barrier along this zone, as indicated by seeps, which occur at this location.

24. A seismic investigation performed by Earth Technology Corporation for the Discharger, dated April 14, 1988, predicted the expected peak ground accelerations (PGAs) at the Facility associated with the maximum probable earthquake (MPE) within a 100-year return period. The models used in the investigation predicted that during an MPE, PGAs at the Facility could reach 0.19g to 0.25g. The study also predicts that the Landfill slopes will remain stable during an MPE resulting from either a large earthquake occurring along the San Andreas Fault or a moderate earthquake occurring close to the Facility.

25. The majority of land within one mile of the Landfill is zoned for residential use, with limited areas designated for open space, special recreation, and commercial land uses. However, the majority of the adjacent property is presently undeveloped. On the northwest, the Facility borders the City-developed Scholl Canyon Golf and Tennis Complex that overlie the inactive North Canyon refuse fill area. The Scholl Canyon Park is located to the west, at the base of the Facility. The nearest residential development is a section of the City of Glendale, along Glenoaks Boulevard, west of the Facility's base, adjacent to Scholl Canyon Park (Figure 4).

26. The Facility is located within the Eagle Rock Hydrologic Subarea which is part of the San Fernando Hydrologic Area of the Los Angeles - San Gabriel River Hydrologic Unit. The Landfill is surrounded on three sides by ridges that restrict inflow to seasonal precipitation. The resultant groundwater flows in alluvium, weathered bedrock, or fractured bedrock generally follows the surface topography and exits the canyon to the west. Water exiting the canyon eventually enters the water-bearing strata of the Los Angeles River watershed.

27. Surface water runoff from the Landfill area drains primarily in a west southwesterly direction (Figure 5). Storm water at the Facility is controlled by channeled ditches, pipelines, drainage benches and interim drainage structures which are designed and maintained to accommodate flows from a 100-year frequency, 24-hour duration storm.

28. The Landfill is located outside of a 100-year flood plain, according to the Federal Emergency Management Agency, Flood Insurance Rate Map, City of Glendale, California, Los Angeles County.

ENVIRONMENTAL PROTECTION AND MONITORING SYSTEMS

29. The Landfill has been operated as a "cut and cover" canyon landfill. Soil, for use as cover material, is excavated within the Landfill property, or provided by reclaiming dirt loads from the incoming waste stream. Refuse is spread and compacted in cells approximately eighteen to twenty feet in height.

30. The Discharger installed a slant seepage interception and collection system near the head of the canyon at the location of several historic natural seeps in 1985 to allow refuse to be place in this area (Figure 6). The slant well became blocked in 1990. In August 2000, a vertical replacement sump (Sump 2) was installed within the SCE easement property (Figure 2 shows the easement).

31. Since 2002, extracted groundwater at the Landfill has been discharged to the City of Glendale's sanitary sewer system pursuant to industrial waste discharge permits issued by the City. Currently, extracted groundwater from the toe barrier is discharged pursuant to Industrial Waste Discharge Permit No. W-3835, while extracted groundwater from Sump 2 is discharged pursuant to Industrial Waste Discharge Permit No. W-2762. Both permits became effective January 1, 2017. Extracted groundwater is not reused at the Landfill~~Extracted groundwater at the Landfill is processed in two air-stripping systems. One of the treatment systems is for processing water extracted from the toe barrier, known as the Canyon Water Treatment Facility, and is located along the south side of the Facility. The other treatment system is for processing water extracted from Sump 2, known as the Sump 2 Treatment Facility, and is located along at the southeast end of the Facility. Varying portions of the treated water is reused for dust control as needed, subject to the requirements of Section H (Requirements for Onsite Water Use) of this Order. The remaining treated water is discharged to the City's sanitary sewer system pursuant to City of Glendale Industrial Waste Discharge Permit No. W-3835, issued on January 1, 2011~~.

32. Section 13273 of the California Water Code, as amended by Assembly Bill (AB) 3525 (Calderon, 1984), required the submittal of a Solid Waste Assessment Test (SWAT) Report for the Scholl Canyon Landfill on or before July 1, 1987. The Discharger submitted a SWAT proposal for the Facility (including both the active Scholl Canyon and inactive North Canyon) on July 1, 1986 and received Regional Water Board approval of the proposal on August 29, 1986.

33. In 1987, to limit offsite water quality impacts, a leachate barrier and collection system (toe barrier) was installed at the western toe of the Facility in Scholl Canyon Park (Figure 7). The purpose of the toe barrier system was to capture leachate and prevent its seepage along the canyon alluvium and uppermost weathered bedrock. The main elements of this system are: 1) a subsurface cement and bentonite barrier keyed at least five feet into competent bedrock and extending across the canyon mouth; 2) a series of extraction wells with dedicated pumps installed on the Landfill side of the barrier; and 3) a pump house for pumping the extracted water to the City of Glendale sewer system, pursuant to City of Glendale Industrial Waste Discharge Permit No. W-3835~~top deck area; 4) and an air-stripping system located on the top deck area~~.

34. The initial groundwater monitoring system, consisting of five upgradient alluvial or fractured bedrock piezometers, two upgradient deep bedrock piezometers, one up-gradient deep bedrock monitoring well, and three down-gradient alluvial monitoring wells, were installed and the first set of water samples were collected in May 1987. The subsurface barrier was completed in July 1987 and an additional five alluvial monitoring wells (MOIA, M03A, M05A, M07A, M09A), five bedrock monitoring wells (M02B, M04B, M06B, M08B, and M10B), and six extraction wells (E01A to E06A) were installed. The first set of samples from the additional

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monitoring wells were taken in September 1987. Since then, samples have been collected on a quarterly basis. The April 15, 1988, SWAT report indicated that elevated levels of COD, total dissolved solids (TDS), iron, manganese, chloride were detected in groundwater at the site. In addition to the metals detected, volatile organic compounds (VOCs) and semi-VOCs (SVOCs) were detected in downgradient monitoring wells. On August 17, 1990, Regional Water Board staff approved the SWAT as complete.

35. In March of 1997, the Discharger submitted a proposed Corrective Action Program (CAP) because of VOCs detected in monitoring wells down gradient of the toe barrier. The CAP included five groundwater extraction wells (EW1B, EW2B, EW3B, EW4B, and EW5B) installed into bedrock. One additional groundwater extraction well (EW3R) was installed in March of 2017.

36. The current groundwater monitoring network at the Landfill includes thirteen groundwater monitoring wells (Figures 7 and 8). All the extraction wells are located on the east side (upgradient) of the toe barrier. The groundwater monitoring wells (M01A, M02B, M03A, M04B, M05A, M06B, M07A, M08B, M09A, M10B, M17A, M18A, and M18B) are located to the west of the toe barrier wall (Figure 7). Wells M17A, M18A, and M18B are located off-site (Figure 8).

37. In May 1987, a perimeter probe system was installed at the Landfill to monitor potential landfill gas migration. Since January 1989 the South Coast Air Quality Management District (SCAQMD) monitoring programs for offsite landfill gas migration, ambient air quality, surface landfill gas emissions, landfill gas quality, and landfill gas combustion efficiency have been implemented at the Landfill. Monitoring data are collected and reported to the SCAQMD.

38. The landfill-gas management system at the Landfill is designed and operated to actively collect and control landfill gas generated within the Landfill. The landfill-gas management system consists of a network of vertical and horizontal extraction wells, laterals, headers, condensate management systems, flare, and a landfill gas-to-energy facility. At present, the landfill gas system consists of 137 vertical landfill gas collection wells installed on the front face of the active area of the Landfill and a gridwork of almost 82,000 linear feet of landfill gas collection trenches, including four auxiliary trenches located on the top surface of the Landfill. Additional trenches and wells will be installed to collect landfill gas generated from newly placed fill.

39. Landfill gas is currently combusted at the City of Glendale's Greyson Power Plant after being compressed at an on-site gas compression facility. Any excess landfill gas not handled by the compressor station is flared at a flare station consisting of three blowers and twelve flares, eight of which are in active use with the remaining four as back-up. When the power plant is down for maintenance, all landfill gas is combusted at the flare station.

40. Landfill gas condensate produced during the withdrawal of landfill gas is treated with an air stripper and a degreaser to remover volatile organic compounds. Treated condensate is discharged to the sanitary sewer system, pursuant to City of Glendale Industrial Waste Discharge Permit No. W-3835. Currently, approximately 2,000-gallons per day of condensate is produced.

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41. The Landfill is equipped with an extensive surface water drainage system that consists of drainage benches, down drain pipes, open channels, desiltation and retention basins, Baker tanks, an energy dissipater, and a box culvert. Runoff from the front face drains to the center drain pipe. The eastern portion of the Landfill drains to a basin on the north side of the Landfill that is designed to capture silt and reduce peak storm flows. The north and center down drains meet at the energy dissipater and then discharge to a box culvert under Scholl Canyon Park, which then discharges into a debris basin operated by the Los Angeles County Department of Public Works (LADPW). This basin empties to the Los Angeles County flood control system through a storm drain under Glen Oaks Boulevard.
42. Storm water discharge at the Landfill is regulated under the State Water Board general industrial storm water permit, Order 2014-0057-DWQ (WDID No. 4A190359001, enrolled on August 2, 2005).

43. The Discharger implements a waste-load-checking program, as managed by the local enforcement agency for CalRecycle, to prevent the disposal of hazardous wastes, designated wastes, or other unacceptable materials from being discharged at the Landfill. Hazardous materials intercepted are temporarily stored in a dedicated hazardous waste storage area and disposed of at an appropriate hazardous waste facility according to hazardous waste laws.

44. Section 20370 of Title 27 requires that MSW units be designed to withstand a maximum probable earthquake (MPE) without damage to the foundation or to the structures which control leachate, surface drainage, or erosion, or gas. This Regional Water Board requires that all final MSW landfill refuse fills must be designed to withstand a maximum credible earthquake (MCE) to prevent failure of the refuse fill during the postclosure maintenance period.

REGULATORY REQUIREMENTS

45. The *Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) designates the following beneficial uses for groundwater within the San Fernando Valley Basin: municipal and domestic supply, agricultural supply, industrial process supply, and industrial service supply. The requirements in this Order, as they are met, are in conformance with the Basin Plan.

46. While the State Water Board and Regional Water Boards are the state agencies designated to protect water quality resulting from solid waste disposal activities, CalRecycle regulates all other aspects of solid waste disposal in the State. To remove regulatory overlap, conflict, and duplication between CalRecycle and the State Water Board/Regional Water Boards, the California Legislature, under the Solid Waste Disposal Regulatory Reform Act of 1993, streamlined the state's solid waste disposal regulatory process by developing one consolidated set of solid waste disposal facility regulations. The revised regulations, as promulgated in Title 27 on July 18, 1997, clarify the roles and responsibilities of CalRecycle and the State Water Board/Regional Water Boards in regulating MSW disposal sites.

47. Title 27 regulations combine prior disposal site/landfill regulations of CalRecycle and the State Water Board/Regional Water Boards that were maintained in titles 14 and 23 of the CCR. The

requirements in this Order conform with the relevant regulations of Title 27, the Federal MSW Regulations, and the Porter-Cologne Water Quality Control Act (commencing with CWC section 13000).

48. The County of Los Angeles Environmental Health Division is the local enforcement agency for CalRecycle in Los Angeles County where the Landfill is located.

49. Section 13267(b) of the CWC authorizes the regional water boards to require a person who has discharged, discharges, or is suspected of having discharged waste to furnish technical and monitoring reports. The technical and monitoring reports required by this Order and the MRP in Attachment A (No. CI-2846) are necessary to ensure compliance with these WDRs.

50. State Water Board Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality of Waters in California, (Resolution 68-16) requires that whenever the existing quality of water is better than the quality established in policies as of the date on which such policies become effective, such higher quality must be maintained. Resolution 68-16 only allows degradation of an existing high quality water if it has been demonstrated to the Water Board that the change is consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses of such water, and will not result in water quality less than that prescribed in the policies. Resolution 68-16 further requires that discharges meet WDRs that will result in the best practicable treatment or control of the discharge necessary to assure that (a) pollution or nuisance will not occur and (b) the highest water quality consistent with the maximum benefit to the people of the State will be maintained. Resolution 68-16 incorporates the federal "antidegradation" policy in 40 CFR section 131.12 where applicable. This Order is consistent with the federal and state antidegradation policies. This Order prohibits discharges of waste to surface waters, requires Dischargers to manage waste and waste disposal to prevent degradation of groundwater, and requires Dischargers to manage waste to minimize odors and prohibit nuisance conditions. The Regional Water Board finds that under normal operating conditions:

    a. The discharge conditions and effluent limitations established in this Order will ensure that the existing beneficial uses and quality of waters of the State in the Region will be maintained and protected, and

    b. Discharges regulated by this Order will not degrade existing water quality if the terms and conditions of this Order are met.

51. The State Water Board has implemented regulations that require the electronic submittal of information (ESI) for Groundwater Cleanup programs (section 3890 et seq. of Title 23 and division 3 of Title 27). Starting January 1, 2005, required electronic submittal and submittal of a portable data format (PDF) copy of certain reports was extended to include all State Board groundwater cleanup programs, including the Land Disposal Program. The requirements contained in this Order conform with ESI reporting regulations.

ADMINISTRATIVE

52. Definitions of terms used in this Order shall be as set forth in Title 27 section 20164, Title 14 of CCR section 17381, CWC section 13050, 40 CFR part 258.2, and other applicable state and federal regulations.

53. The reissuance of the Discharger's WDRs is exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000 et seq.) pursuant to Title 14 of the CCR section 15301 for existing facilities.

54. The Regional Water Board notified the Discharger, interested agencies, and all known interested persons of its intent to issue requirements for waste disposal for the Landfill and provided an opportunity to submit written and oral comments in compliance with applicable notice and public comment requirements. The Regional Water Board in a public meeting on March 14, 2019 heard and considered all comments pertaining to waste disposal at the Landfill.

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with CWC section 13320 and Title 23 of CCR section 2050 and following. The State Water Board must receive the petition by 5:00 p.m., thirty days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: *http://www.waterboards.ca.gov/public_notices/petitions/water_quality* or will be provided upon request.

IT IS HEREBY ORDERED that the Discharger shall comply with the following requirements pertaining to the Landfill:

A. Specifications

1. The Discharger shall only accept waste for disposal at the Landfill that is deemed acceptable for disposal at a MSW facility by the Regional Water Board through orders or regulations.

2. Wastes disposed of at the Landfill shall be limited to municipal solid wastes (as described in Title 27 section 20220(a)), inert waste (as described in Title 27 section 20230), and non-hazardous, non-designated contaminated soils and related wastes in accordance with Regional Water Board Order No. R4-2011-0052.

3. Non-hazardous solid waste means all putrescible and non-putrescible solid, semi-solid and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction wastes, abandoned vehicles and parts thereof, discarded home and industrial appliances, manure, vegetable or animal solid and semi-solid wastes, and other discarded waste (whether of solid or semi-solid consistency); provided that such wastes do not contain wastes which must be managed as hazardous wastes, or wastes which contain soluble pollutants in concentrations which exceed

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applicable water quality objectives, or could cause degradation of waters of the state (i.e., designated waste).

B. Unacceptable Materials

1. No hazardous wastes (as defined in Title 22 of CCR section 66261.3 et seq.), designated wastes (as defined in CWC section 13173), or special wastes (Title 27 section 20164, as categorized in Title 22 of CCR sections 66261.120, 66261.122, and 66261.124), such as liquids, oils, waxes, tars, soaps, solvents, or readily water-soluble solids, such as salts, borax, lye, caustic or acids shall be disposed of at the Landfill.

2. No semi-solid wastes shall be disposed of at the Landfill unless they are first processed in a solidification operation approved by the Regional Water Board Executive Officer. Semi-solid waste means waste containing less than fifty percent solids, as described in Title 27 section 20200(d)(3). In cases of spoiled, discarded, or expired semi-solid food wastes, Regional Water Board staff is authorized to approve solidification or waste disposal operations at the Landfill on a case-by-case basis.

3. No radioactive waste, including low level radioactive waste, as defined by the agency with jurisdictional authority, shall be disposed of at the Landfill.

4. No materials that are of a toxic nature, such as insecticides, poisons or hazardous materials, shall be disposed of at the Landfill.

5. No medical wastes, including infectious materials, hospital or laboratory wastes, except those authorized for disposal to land by the agency with jurisdictional authority for the control of plant, animal and human disease, shall be disposed of at the Landfill.

6. No pesticide containers shall be disposed of at the Landfill, unless they are rendered non-hazardous by triple rinsing. Otherwise, they must be hauled offsite to a legal point of disposal.

7. No septic tank or chemical toilet wastes shall be disposed of at the Landfill.

C. Prohibitions

1. The discharge of waste to land as a result of inadequate waste disposal practices, and that have not been specifically described to the Regional Water Board and for which valid WDRs are not in force, are prohibited.

2. The discharge of waste shall not:

   a. cause the occurrence of coliform or pathogenic organisms in the groundwater basin;
   b. cause the occurrence of objectionable tastes or odors in the groundwater basin;
   c. cause waters pumped from a groundwater basin to foam;
   d. cause the presence of toxic materials in the groundwater basin;

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e. cause the pH of waters in the groundwater basin to fall below ~~6.5~~6.0, or rise above 9.0;
f. cause the Regional Water Board's objectives for groundwater or surface waters as established in the Basin Plan to be exceeded; or
g. cause pollution, contamination, or nuisance, as defined in CWC section 13050, or adversely affect beneficial uses of groundwater or surface waters as established in the Basin Plan.

3. Odors, vectors, and other nuisances originating from waste that migrate beyond the limits of the Landfill are prohibited.

4. The discharge of waste to surface drainage courses or groundwater is prohibited.

5. The Discharger shall conduct site operations such that no constituent of concern (COC) shall exhibit a measurably significant increase over its respective concentration limit (background data set) at any well, as indicated by an approved statistical or non-statistical data analysis method (including the method retesting approach).

6. The Discharger shall comply with all federal, state, and county sanitary health codes, rules, regulations, and ordinances pertinent to the disposal of wastes on land and the operation and maintenance of the Landfill.

D. Requirements for Disposal Site Operations

1. The Discharger shall maintain an operating record for the Landfill in accordance with 40 CFR section 258.29(a). All records of Landfill operations, construction, inspection, monitoring and remediation, and copies of design plans, construction quality assurance documents, monitoring reports, and technical reports that are submitted to regulatory agencies, shall be included in the operating record.

2. The Discharger shall comply with notification procedures contained in CWC section 13271 regarding the discharge of hazardous wastes. The Discharger shall remove and relocate to a legal point of disposal any wastes that are discharged at the Landfill in violation of these requirements. For the purpose of these requirements, a legal point of disposal is defined as a point of disposal for which a California Regional Water Quality Control Board has established WDRs with which the point of disposal is in full compliance. If hazardous waste has been discharged to the Landfill, ~~T~~the Discharger shall inform the Regional Water Board pursuant to ESI reporting requirements within seven (7) days of when the Discharger determines that relocation of wastes is necessary. The source and final disposition (and location) of the wastes, as well as methods undertaken to prevent future recurrence of such disposal shall also be reported.

3. The Landfill shall be graded and maintained to promote runoff of precipitation to the stormwater control facilities and to prevent ponding of liquids and surface water. Erosion or washout of refuse or cover materials by surface flows shall be controlled to prevent offsite migration.

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4. All wastes shall be covered at least once during each 24-hour period in accordance with Title 27 sections 20680, 20690, and 20705. Intermediate cover over wastes discharged to the Landfill shall be designed and constructed to minimize percolation of precipitation through wastes and contact with waste materials.

5. Wastes deposited at the Landfill shall be confined thereto, and shall not be permitted to blow, fall, or otherwise migrate off the Landfill, or to enter water drainage or water courses offsite.

6. Alternate daily cover (ADC) may be used consistent with Title 27 section 20690 and Regional Water Board Order No. R4-2011-0052.

7. The migration of gases from the Landfill shall be controlled as necessary to prevent water pollution, nuisance, or health hazards.

8. The Discharger shall intercept and remove any ~~liquid detected in a Landfill LCRS~~gas condensate and contaminated groundwater to a legal point of disposal, or as specified in these WDRs, unless it is otherwise approved by the Regional Water Board Executive Officer. If any liquid is determined to be hazardous, a licensed hazardous waste hauler shall transport all such liquid to an approved treatment and disposal facility.

9. In any area within the Landfill where a natural spring or seep is observed, provisions shall be made and/or facilities shall be provided to ensure that this water will not come in contact with refuse in the Landfill. The locations of all springs and seeps found prior to, during, or after placement of waste material that could affect the Landfill shall be reported to the Regional Water Board in accordance with the MRP~~semiannually. The Discharger shall monitor seepage for the monitoring parameters identified in the MRP (No. CI-2846)~~.

10. In accordance with Title 27 section 20240(c), waste material shall not be discharged on any ground surface that is less than five feet above the highest anticipated groundwater elevation.

11. The Discharger shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used to achieve compliance with conditions of this Order.

12. Any abandoned wells or bore holes under the control of the Discharger, and situated within the Landfill boundaries, must be located and properly modified or sealed to prevent mixing of any waters between adjacent water-bearing zones. A notice of intent to decommission a well must be filed with the appropriate regulatory agencies prior to decommissioning. Procedures used to decommission these wells, or to modify wells still in use, must conform to the specifications of the local health department or other appropriate agencies.

13. The Discharger shall establish and maintain a sufficient number of benchmarks at the Landfill to enable reference to key elevations and to permit control of critical grading and compaction operations.

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14. The Discharger shall submit to the Regional Water Board and to CalRecycle evidence of financial assurance for closure and postclosure maintenance, pursuant to Title 27 sections 22200 through 22278. The postclosure period shall be at least thirty years. However, the postclosure maintenance period shall extend as long as wastes pose a threat to water quality.

15. In accordance with section 22220 of Title 27, the Discharger maintains assurance of financial responsibility for initiating and completing corrective action for all known or reasonably foreseeable releases from the existing Landfill (Title 27 22220 et seq.). The Discharger shall work with CalRecycle staff to provide and maintain acceptable financial assurance mechanisms for corrective action.

E. Requirements for Waste Containment Systems

1. Design specifications, including any alternative design proposal meeting the prescriptive standards and/or performance goals of Title 27, are subject to the Regional Water Board Executive Officer's approval prior to construction of any containment structure. The Discharger shall submit detailed design plans, specifications, and descriptions for all proposed containment structures and construction features for the Regional Water Board Executive Officer's approval at least 90 days prior to construction. The design plans shall contain detailed quality assurance/quality control requirements for the proposed construction as required by Title 27.

2. As part of the design report for each composite liner phase constructed at the Landfill, the Discharger shall include updated seismic stability analyses that consider the MCE to resist settlement and prevent failure for the proposed waste mass thickness/configuration. Moreover, the report shall include copies of all information cited in the analyses, including but not limited to:

   a. A summary of subsurface data used in the stability design of the composite liner system. Specifically, soils data for any alluvium present, information regarding the location, extent, and any investigations performed on existing landslides, and updated groundwater data to confirm the historical high groundwater elevation;

   b. Laboratory testing/data for the engineering properties of all earth materials and geomembrane/geotextile liner materials. Specifically, estimates of the internal strength and interface strength of the geomembrane/geotextile from actual test results from similar configurations or from the literature; and

   c. A liquefaction analysis for any areas where a significant amount of saturated alluvium is to remain after excavation for the composite liner foundation.

3. All containment structures and erosion and drainage control systems at the Landfill shall be designed and constructed under direct supervision of a California-Registered Civil Engineer or Certified Engineering Geologist and shall be certified by the individual as meeting the prescriptive standards and/or performance goals of Title 27.

4. The Landfill shall be designed, constructed, and maintained to prevent, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, and washout in compliance with Title 27 sections 20365 and 21090(b)(1) which could occur as a result of precipitation from a 100-year, 24-hour frequency storm. This shall be accomplished by, at a minimum, the following:

    a. Top deck surfaces shall be constructed to achieve a minimum of three percent slope, including structures which direct water to downdrains, unless an alternative has been approved by the Regional Water Board Executive Officer in accordance with Title 27 section 21090(b)(1)(B);

    b. Downdrains and other drainage structures must be constructed for all sideslopes as necessary; and

    c. All components of the Landfill drainage system must be designed and constructed to withstand site-specific maximum intensity precipitation (peak flow) from a 100-year, 24-hour storm.

5. The Discharger shall install new and replacement landfill gas probes and gas collection systems (wells and trenches) necessary to maintain landfill gas control throughout the Landfill.

6. Leachate and landfill-gas condensate containment systems shall be protected and maintained continuously to ensure their effectiveness and to prevent commingling of leachate and gas condensate with surface water run-on and runoff.

7. The Discharger shall design, construct, and maintain:

    a. A run-on drainage control system to prevent flow from sources offsite onto the disposal areas of the Landfill (active or inactive portions), and to collect and divert the calculated volume of precipitation and the peak flow from a 100-year, 24-hour storm. When necessary, temporary structures shall be installed to comply with this requirement;

    b. A runoff drainage control system to minimize sheet flow from disposal areas, and to collect and divert the calculated volume of precipitation and the peak flow from a 100-year, 24-hour storm; and

    c. Drainage control structures to divert natural seepage from native ground and to prevent such seepage from entering the Landfill.

    d. All drainage structures shall be protected and maintained continuously to ensure their effectiveness.

8. Periodic inspection of the Landfill, including drainage control systems and all containment structures, shall be performed to assess the conditions of these facilities and to maintain compliance with this Order.

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9. The static factor-of-safety (FOS) of final configurations of the Landfill, including liner systems, final covers, and cut and fill slopes, shall not be less than 1.5, while the static FOS for interim slopes (slopes existing for a period less than six months) shall not be less than 1.2.

10. Landfill refuse slopes shall be designed pursuant to requirements in Title 27 and constructed in a manner that will resist settlement and prevent failure during an MPE for interim slopes, or an MCE for final refuse slopes. Critical slopes shall be designed to have a FOS no less than 1.5. If a Newmark-type seismic deformation analysis is used in lieu of achieving a FOS of no less than 1.5, the calculated permanent seismic deformation must not exceed six (6) inches for liner systems and must not exceed 36 inches for the final cover.

11. Prior to the start of construction of any waste containment structure in native areas, a geologic map of the final excavation grade shall be prepared for review, approval, and confirmation in the field by Regional Water Board staff.

12. The construction report, including construction quality assurance (CQA) data and drawings documenting "as-built" conditions, shall be submitted within 60 days after the completion of construction. If the "as-built" conditions are virtually identical to the approved preliminary plans and specifications, only change sheets need be submitted in lieu of a complete set of drawings.

13. No waste disposal operations shall occur in a new area until the corresponding construction is completed, certified to meet design standards by the engineer of record, and approved by the Regional Water Board staff.

14. The Discharger shall perform ~~an annual~~ testing per Title 27 section 20340(d) and in accordance with the MRP of all LCRS(s) to demonstrate their operating efficiency during the operational, closure and postclosure maintenance periods of the Landfill.

F. Requirements for Groundwater Monitoring

1. The Discharger shall implement the attached MRP (No. CI-2846) and revisions thereto, in order to detect, at the earliest opportunity, any unauthorized discharge of waste constituents from the Landfill or any impairment of beneficial uses associated with the discharges of waste from the Landfill.

2. In accordance with Title 27 section 20390, the water quality protection standards (WQPS) for the Landfill are established as the natural background groundwater quality at the Landfill, which is set to either the statistically predicted value (if the constituent naturally exists) or the laboratory detection limit (if the constituent does not naturally exist in the water analyzed). The following are five parts of the WQPS as established by the Regional Water Board:

   a. The WQPS may be modified for site specific purposes by the Regional Water Board based on more recent or complete groundwater monitoring data such as from the

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monitoring network required by this Order, changes in background water quality, or for any other reason deemed valid by the Regional Water Board Executive Officer. Proposed changes must be in accordance with guidelines described in appropriate sections of Title 27;

b. The Discharger shall test for the monitoring parameters and the COCs listed in the MRP;

c. Concentration Limits - The concentration limit for each monitoring parameter and COC for each monitoring point shall be its background value as calculated using an appropriate statistical methodology for a given reporting period;

d. Monitoring points - Monitoring points for the Landfill shall be those listed in the MRP; and

e. Compliance period - The compliance period for the Landfill (i.e. the minimum period during which the Discharger shall conduct a water quality monitoring program) shall extend past the closure of the Landfill and through the regulatory postclosure maintenance period.

3. The Discharger shall conduct required monitoring and response programs in accordance with Title 27 section 20385 *et. seq.* (i.e., a detection monitoring program per Title 27 section 20420 if no measurably significant release of waste has been detected, an evaluation monitoring program per Title 27 section 20425 if measurably significant release of waste has been detected, or a corrective action program per Title 27 section 20430if corrective action is required).

4. At any time, the Discharger may file a written request, including appropriate supporting documents, with the Regional Water Board Executive Officer, proposing modifications to the MRP. The Discharger shall implement any changes in the revised MRP approved by the Regional Water Board Executive Officer upon receipt of a signed copy of the revised MRP.

5. Monitoring parameters and COCs listed in the MRP are subject to appropriate statistical or non-statistical tests included in the MRP sections and may be revised by the Regional Water Board Executive Officer as needed.

6. Data produced and reports submitted under the MRP must be generated by a laboratory accredited by the State of California Environmental Laboratory Accreditation Program (ELAP). The laboratory must hold a valid certificate of accreditation for the analytical test methods specified in the latest edition of the USEPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846), or equivalent analytical test methods validated for intended use and approved by the Regional Water Board Executive Officer. The laboratory must include quality assurance/quality control data in all laboratory reports. Data generated using field tests is exempt pursuant to CWC section 13176.

7. The Discharger shall furnish, under penalty of perjury, technical or monitoring program reports in accordance with CWC section 13267. Failure or refusal to furnish these reports or falsifying any information provided therein renders the Discharger guilty of a misdemeanor and subject to the penalties stated in CWC section 13268. Monitoring reports shall be submitted in accordance with the specifications contained in the MRP, which may be subject to periodic revisions, as warranted and approved by the Regional Water Board Executive Officer.

8. The effectiveness of all monitoring wells, monitoring devices, and leachate and gas collection systems shall be maintained for the active life of the Landfill and during the closure and postclosure maintenance periods in accordance with acceptable industry standards. If any monitoring wells and/or monitoring devices are damaged, destroyed, or abandoned for any reason, the Discharger shall immediately provide substitutes acceptable to the Regional Water Board Executive Officer to meet the monitoring requirements of this Order.

9. The Discharger shall maintain a Monitoring Well Preventative Maintenance Program for the Landfill. Elements of the program shall include, as a minimum, periodic visual inspections of well integrity, pump removal and inspection, and appropriate inspection frequencies.

10. If a well or piezometer is found to be inoperative, the Regional Water Board and other interested agencies shall be so informed pursuant to ESI reporting requirements within seven (7) days of such discovery, and this notification shall contain a time schedule for returning the well or piezometer to operating order. Changes to the existing monitoring program shall be submitted for Regional Water Board Executive Officer's approval at least thirty (30) days prior to implementing the change(s).

11. For any monitoring wells or piezometers installed in the future, the Discharger shall submit technical reports for approval by the Regional Water Board Executive Officer prior to installation. These technical reports shall be submitted at least sixty (60) days prior to the anticipated date of installation of the wells or piezometers. These reports shall be accompanied by:

    a. Maps and cross sections showing the locations of the monitoring points; and,

    b. Drawings and data showing construction details of the monitoring points. These data shall include:
        i. Casing and test hole diameter;
        ii. Casing materials;
        iii. Depth of each hole;
        iv. The means by which the size and position of perforations shall be determined, or verified, if in the field;
        v. Method of joining sections of casing;
        vi. Nature of filter materials;
        vii. Depth and composition of soils; and

viii. Method and length of time of well development.

12. The Discharger shall install any additional groundwater, soil pore liquid, soil pore gas, or leachate monitoring devices necessary to comply with the MRP.

13. The Discharger shall provide for proper handling and disposal of water purged from the monitoring wells during sampling. Water purged from a well shall not be returned to that well (or any other well).

14. The point(s) of compliance where the WQPS apply shall be located along downgradient edges of waste management units at the Landfill or an alternate location approved by the Executive Officer. The points of compliance extend through the zone of saturation.

G. Requirements for a Corrective Action Program

1. The Discharger shall continue the Corrective Action Program (CAP) at the Landfill that currently includes monitoring of groundwater wells listed in the MRP and the proper managing of the landfill gas collection system to prevent the contact of landfill gas with groundwater.

2. In each semi-annual report submitted under the MRP, the Discharger shall summarize all corrective action taken at the Landfill during the reporting period and the corrective action that will be taken for following monitoring periods. The Executive Officer may require additional corrective action that is deemed necessary.

3. If the Discharger or Executive Officer determines that the CAP either fails to contain the release or fails to provide effective remediation for the portion of the aquifer already affected by the release, the Discharger shall, pursuant to Title 27 sections 20430(i) or (j) and 40 CFR section 258.58(b), submit an amended JTD to make appropriate changes to the CAP within 90 days of the determination.

H. Requirements for Onsite Water Use

1. No water shall be routinely applied to refuse fill areas except for landscape irrigation, dust control, winter deck construction, road construction, final cover construction or non-emergency uses approved by the Regional Water Board Executive Officer. Water used for irrigation, dust control, or construction purposes shall be applied only on completed lifts, in quantities not to exceed that necessary to reduce immediate dust hazards, support plant life, or to achieve desired compaction. Overflow or runoff caused by the over-application or improper management of irrigation or dust control water is prohibited. Any water used at the Landfill, except for potable water, reclaimed water regulated under Regional Water Board Water Recycling Requirements (WRRs), and any other water allowed by the Regional Water Board Executive Officer, shall be subject to these WDRs.

2. No wastewater shall leave the Landfill and discharge into a surface water except as permitted by an NPDES permit issued in accordance with the Clean Water Act and CWC.

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3. All use of landscape irrigation, or dust control water shall be within the boundaries of the Landfill property. During an emergency, this water may be used for firefighting on the Landfill or on undeveloped areas off and adjacent to the site.

4. Washing of Landfill equipment or vehicles shall be confined to areas where the wastewater will not percolate into the disposal areas, native soils, or enter the storm water collection system.

5. Wastewater used at the Landfill shall not percolate into the disposal areas or native soil, or enter storm water collection systems, except as specifically permitted by this Order.

6. During periods of precipitation, when the reuse of any wastewater is not necessary for the purposes specified in this Order, the wastewater shall be stored or disposed of at a legal point of disposal.

7. Washing of paved Landfill roads during rainy periods shall only occur when muddy roads create a safety concern.

8. Wastewater from cleaning site equipment, water purged from wells, condensate removed from the Landfill gas collection system, and leachate removed from the Landfill LCRS intended to be used onsite for dust control, composting operations, or irrigation shall at all times be within the range of 6.5 to 8.5 pH units, and shall not exceed the following limits:

Constituent	Concentration
Total organic carbon	110 mg/L
Oil or grease	15 mg/L
Volatile Organic Compounds	Not to exceed MCLs

9. A sampling station *for each wastewater source to be reused onsite, other than recycled water,* shall be established ~~for each wastewater source~~ at locations where representative samples can be obtained. Wastewater samples shall be obtained at sampling stations prior to being mixed with other sources of water. The minimum sampling frequency for wastewaters ~~is~~shall be *in accordance with Section C.2.m of the MRP.*~~on a quarterly basis for water used for dust control, irrigation or other on-site land applications, except for water purged from wells where the minimum sampling frequency shall be semi-annual~~.

10. Should there be a change in wastewater sampling stations, the Discharger shall submit to the Regional Water Board a technical report containing a complete description of each proposed wastewater sampling station. Data to support the claim that the proposed station will provide samples representative of the entire flow from that source shall be included.

I. Requirements for Reporting Scheduled Activities

1. The Discharger shall comply with all reporting requirements included in the MRP.

2. The Discharger must obtain Regional Water Board approval at least thirty (30) days prior to any maintenance activities that could alter existing surface drainage patterns or change

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existing slope configurations. These activities may include, but not be limited to, significant grading activities, the importation of fill material, the design and installation of soil borings, groundwater monitoring wells and other devices for Landfill investigation purposes.

3. The Discharger shall furnish, within a reasonable time, any information the Regional Water Board may require to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Discharger shall also furnish to the Regional Water Board, upon request, copies of records required to be kept by this Order.

4. If the Discharger becomes aware that the Discharger failed to submit any relevant facts in any report to the Regional Water Board, it shall submit such facts or information pursuant to ESI reporting requirements within seven (7) days of its discovery of the omission.
5. The Discharger shall notify the Regional Water Board of any incident resulting from Landfill operations that may endanger human health or the environment, by telephone or email within 24 hours, and submit a written report pursuant to ESI reporting requirements within seven (7) days. The written notification shall fully describe the incident including what occurred, when it occurred, the duration of the incident, when correction occurred (or when correction will occur if it is a continuing incident), and the steps taken or planned to reduce, eliminate, or prevent recurrence. All instances of non-compliance with this Order shall also be reported to the Regional Water Board in the same manner as stated above and included in the next scheduled monitoring report.

6. The Discharger shall notify the Regional Water Board pursuant to ESI reporting requirements within seven days if leachate is detected in a previously dry LCRS.

7. Pursuant to Title 27 sections 21130 and 21132, the Discharger shall submit a copy of an emergency response plan, including any proposed amendments thereto, to the Regional Water Board within 90 days of the adoption of this Order.

8. In accordance with Title 27 section 21710(a)(4), the Discharger shall notify the Regional Water Board of changes in information submitted to the Regional Water Board and supplementary information, including any material change in the types, quantities, or concentrations of wastes discharged, or Landfill operations and features. The Discharger shall notify the Regional Water Board at least 120 days before any material change is made at the Landfill.

9. The Discharger shall comply with the closure and postclosure maintenance requirements and notification requirements contained in Title 27 section 21769. Closure must be in accordance with a closure plan and postclosure maintenance plan approved by the Regional Water Board Executive Officer and CalRecycle.

10. The Discharger shall report (on a semi-annual basis) the total volume of all irrigation water used at the Landfill each month and the area(s) where it is applied.

11. All applications, reports, or information submitted to the Regional Water Board Executive Officer shall be signed and certified as follows:

a. The applications, reports, or information shall be signed as follows:

   i. For a corporation - by a principal executive officer of at least the level of vice-president.

   ii. For a partnership or sole proprietorship - by a general partner or the proprietor, respectively.

   iii. For a municipality, state, federal or other public agency - by either a principal executive officer or ranking elected official.

   iv. For a military installation - by the base commander or the person with overall responsibility for environmental matters in that branch of the military.

b. All other reports and information required by this Order shall be signed by a person designated in paragraph [a] of this provision, or by a duly authorized representative of that person. An individual is a duly authorized representative only if:

   i. The authorization is made in writing by a person described in paragraph [a] of this provision;

   ii. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity; and

   iii. The written authorization is submitted to the Regional Water Board Executive Officer.

c. Any person signing a document under this section shall make the following certification:

   "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violation."

J. General Provisions

1. Where necessary to protect water quality, pursuant to Title 27 sections 20012 (a) and (b), the Regional Water Board can implement CalRecycle requirements promulgated in Title 27.

2. This Order does not authorize violation of any federal, state, or local laws or regulations.

3. The Discharger shall comply with all applicable provisions, requirements, and procedures contained in Title 27 and any future amendments.

4. The Discharger shall maintain a copy of this Order at its local offices and shall ensure that at a minimum all supervisory site-operating personnel are familiar with its content and that it is available to operating personnel at all times.

5. The Discharger shall allow the Regional Water Board, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

   a. Enter upon the Discharger's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;

   b. Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this Order;

   c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and

   d. Sample or monitor at reasonable times, for the purpose of assuring compliance with this Order or as otherwise authorized by the CWC, any substances or parameters at this location.

6. All regulated disposal systems shall be readily accessible for sampling and inspection.

7. This Order includes the *Standard Provisions Applicable to Waste Discharge Requirements* in Attachment B. If there is any conflict between provisions stated herein and the standard provisions, the provisions stated herein will prevail.

8. The Discharger shall contact the Regional Water Board within 48 hours of any significant earthquake event that has impacted the Landfill. A significant earthquake is herein defined as an earthquake event above Richter Magnitude 5.0 within a 100-kilometer radius of the property boundaries of the Landfill. A detailed post-earthquake report describing any physical damages to the containment features, groundwater monitoring and/or leachate control facilities, and a plan for corrective action, including implementation schedule, shall be submitted to the Regional Water Board within seven days.

9. The Discharger shall contact the Regional Water Board within 48 hours of any significant wildfire or other natural disaster that has impacted the Landfill. A significant wildfire or other natural disaster is herein defined as any such event that have caused damages to liners, final covers (including vegetative coverage), groundwater monitoring and/or leachate control facilities, surface water drainage system, and landfill equipment. A detailed report describing all damages that may have an impact to waters of the state, any recovery actions that have been taken, and any planned recovery actions, including an implementation schedule, shall be submitted to the Regional Water Board within seven days.

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10. Pursuant to Title 27 sections 20012, 21200 and 21630, the Discharger shall notify the Regional Water Board Executive Officer, pursuant to ESI reporting requirements, at least thirty (30) days in advance of any proposed transfer of this Order's responsibility and coverage between the Discharger and a new owner or operator of the Landfill. Any transfer agreement between the Discharger and a new owner or operator shall include an acknowledgement that the Discharger is liable for violations up to the transfer date and that the new owner or operator is liable from the transfer date on. The agreement shall include an acknowledgement that the new owner or operator shall accept responsibility for compliance with this Order and Title 27 requirements for operations, closure, and postclosure maintenance of the Landfill.

11. This Order is not transferable to any person except after notice to the Regional Water Board Executive Officer. The Regional Water Board may require modification or revocation and reissuance of this Order to change the name of the Discharger and incorporate such other requirements as may be necessary under the CWC.

12. The Discharger shall immediately notify the Regional Water Board of any flooding, fire, slope failure or other change in Landfill conditions, which could impair the integrity of waste containment facilities or of precipitation and drainage control structures.

13. The Discharger shall comply with all conditions of this Order and any amendments. Non-compliance with this Order constitutes a violation of the CWC and is grounds for:

    a. Enforcement action, including Regional Water Board orders or court orders, requiring corrective action or imposing civil monetary liability;

    b. Termination, revocation and reissuance, or modification of this Order; or

    c. Denial of an application for new or revised WDRs.

14. The Discharger shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from non-compliance with this Order, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the non-compliance.

15. This Order may be modified, revoked and reissued, or terminated for cause including, but not limited to, the following:

    a. Violation of any terms or conditions of this Order;

    b. Obtaining this Order by misrepresentation or failure to disclose fully all relevant facts; or

    c. A change in any condition that requires either a temporary or permanent reduction, or elimination of the authorized discharge.

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16. In accordance with CWC section 13263(g), these requirements shall not create a vested right to continue to discharge and are subject to termination or modification. All discharges of waste into the waters of the state are privileges, not rights.

17. The filing of a request by the Discharger for the modification, revocation and reissuance, or termination of this Order or notification of planned changes or anticipated non-compliance does not stay any condition of this Order.

18. The provisions of this Order are severable, and if any provision of this Order, or the application of any provision of this Order to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Order, shall not be affected thereby.

19. Pursuant to CWC section 13263(e), these requirements are subject to periodic review and revision by the Regional Water Board.

20. This Order becomes effective on the date of adoption by the Regional Water Board.

K. Termination

1. Except for enforcement purposes, Regional Water Board Order No. 01-132, adopted on September 19, 2001, is hereby terminated.

I, Deborah J. Smith, Executive Officer, do certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on March 14, 2019.

_____
Deborah J. Smith
Executive Officer

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FIGURE 1:
LOCATION MAP

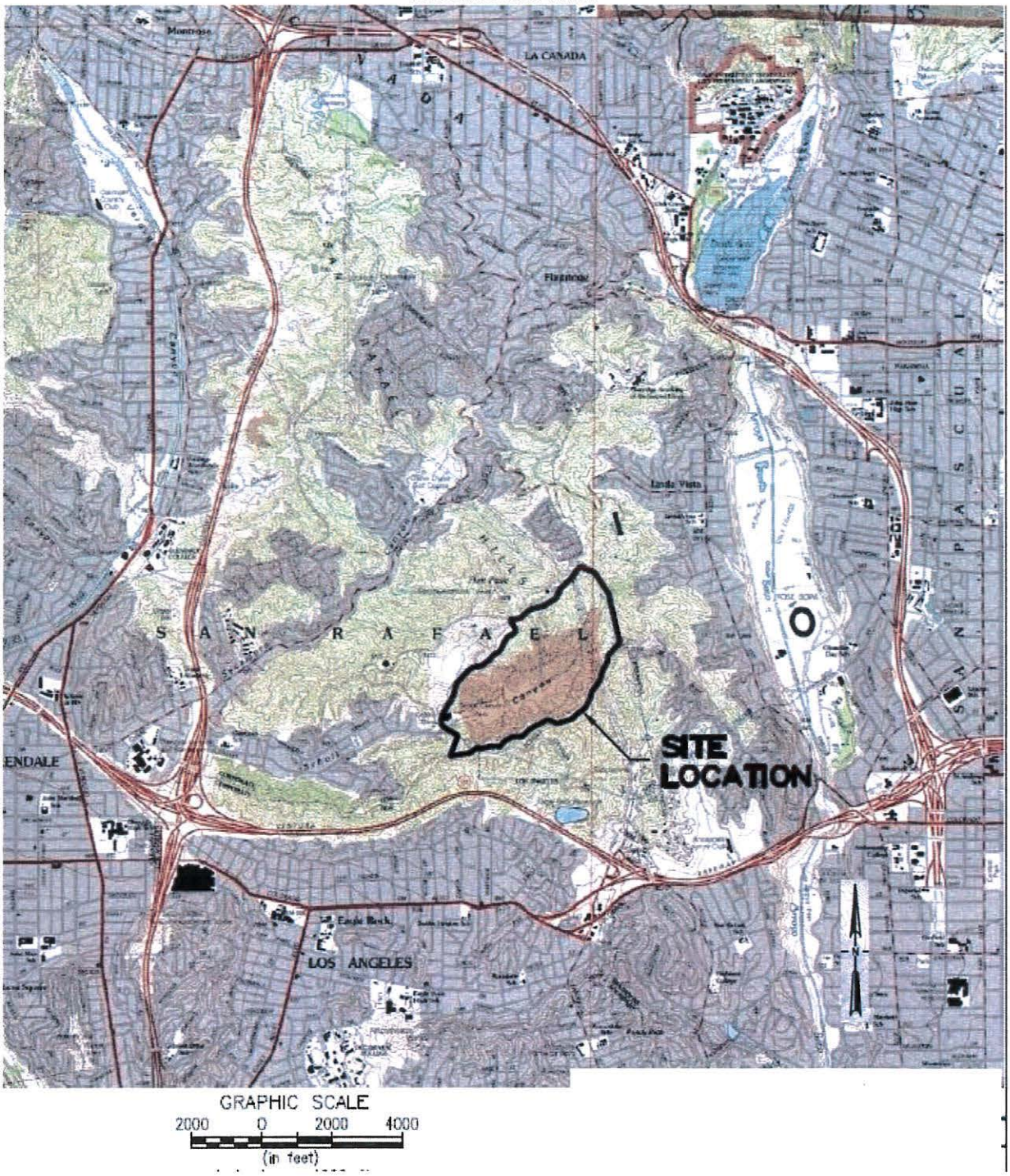

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FIGURE 2:
LANDFILL PARCELS

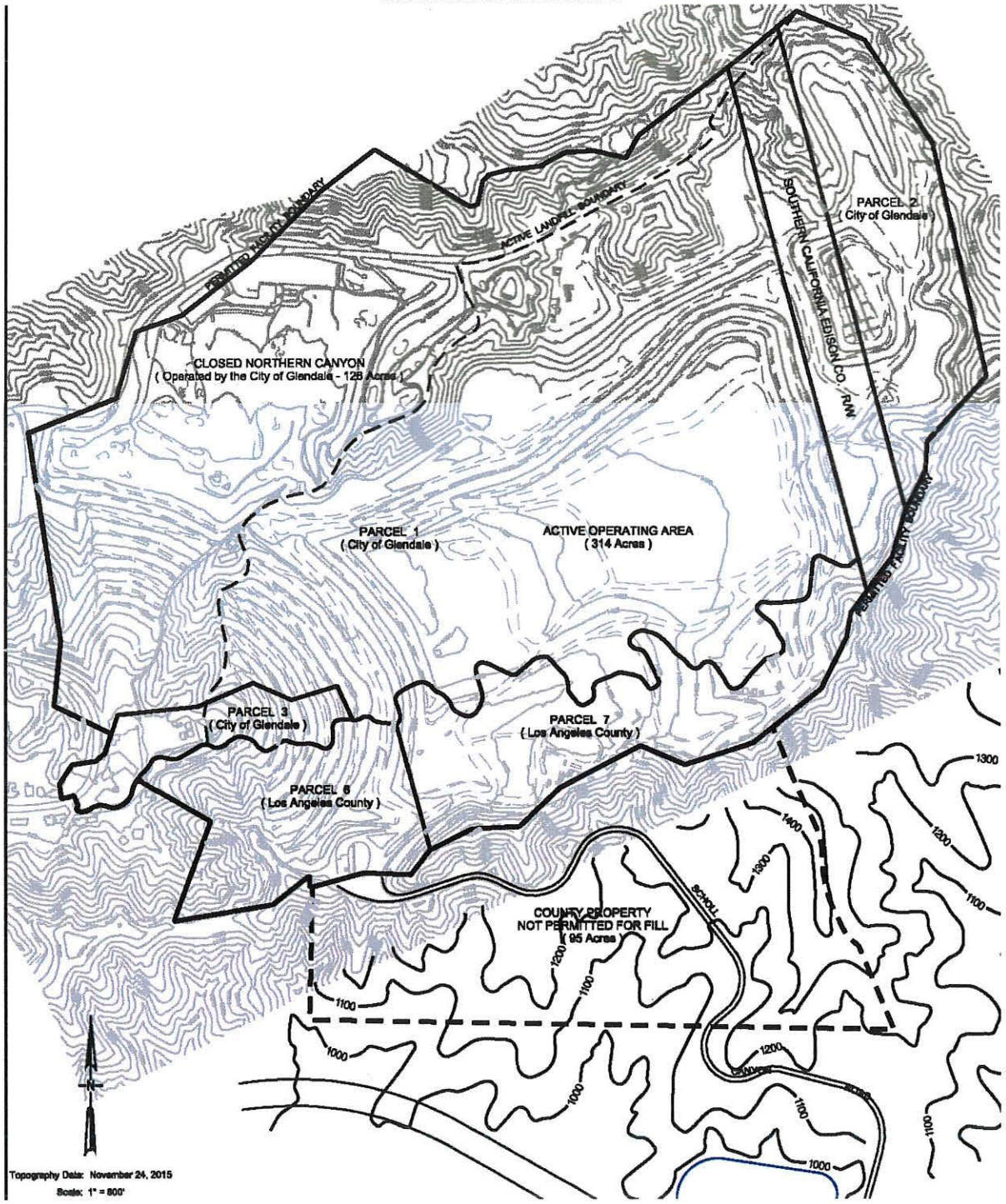

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FIGURE 3:
PARTIAL FINAL LANDFILL COVER

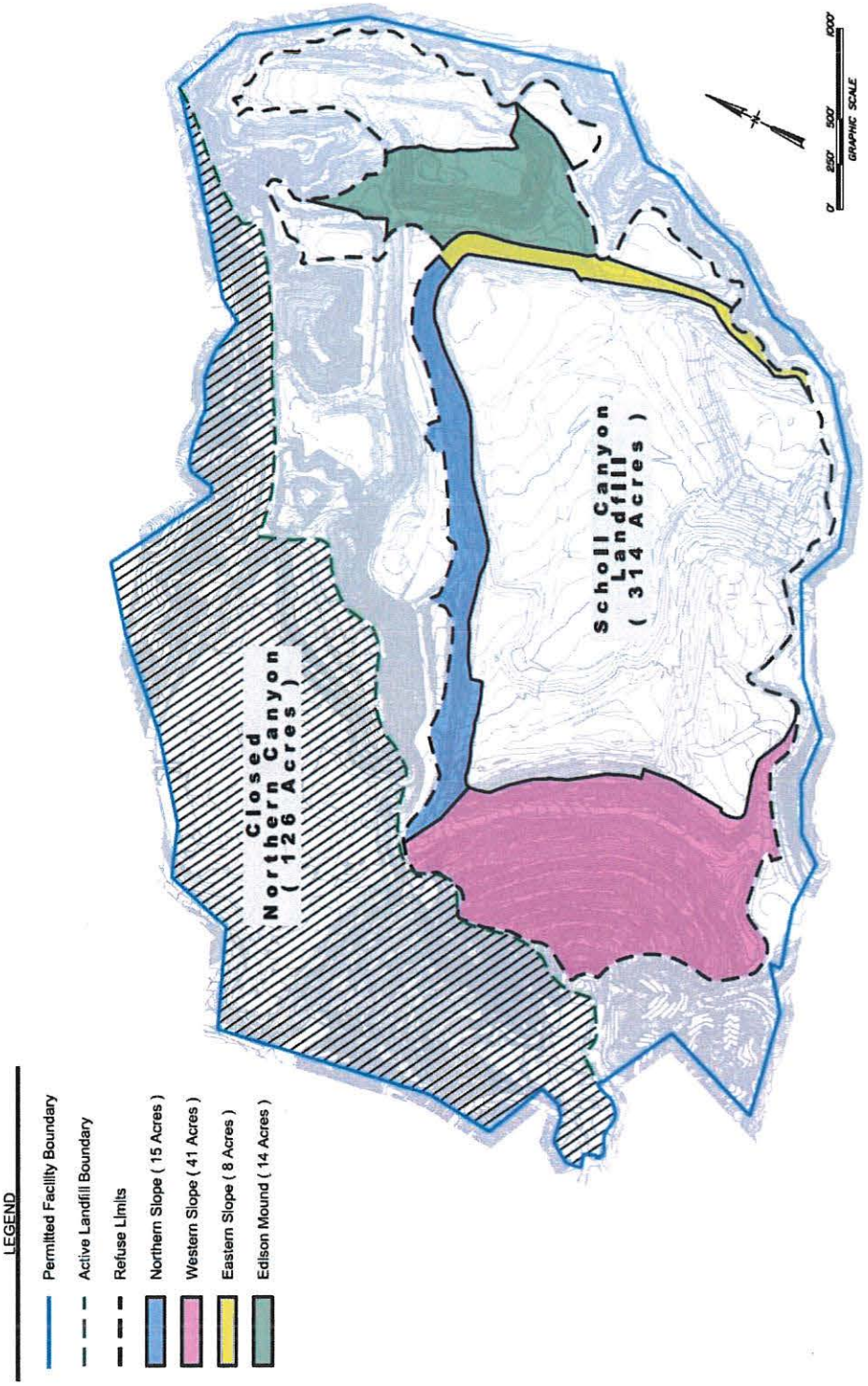

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FIGURE 4:
LAND USE NEAR THE LANDFILL

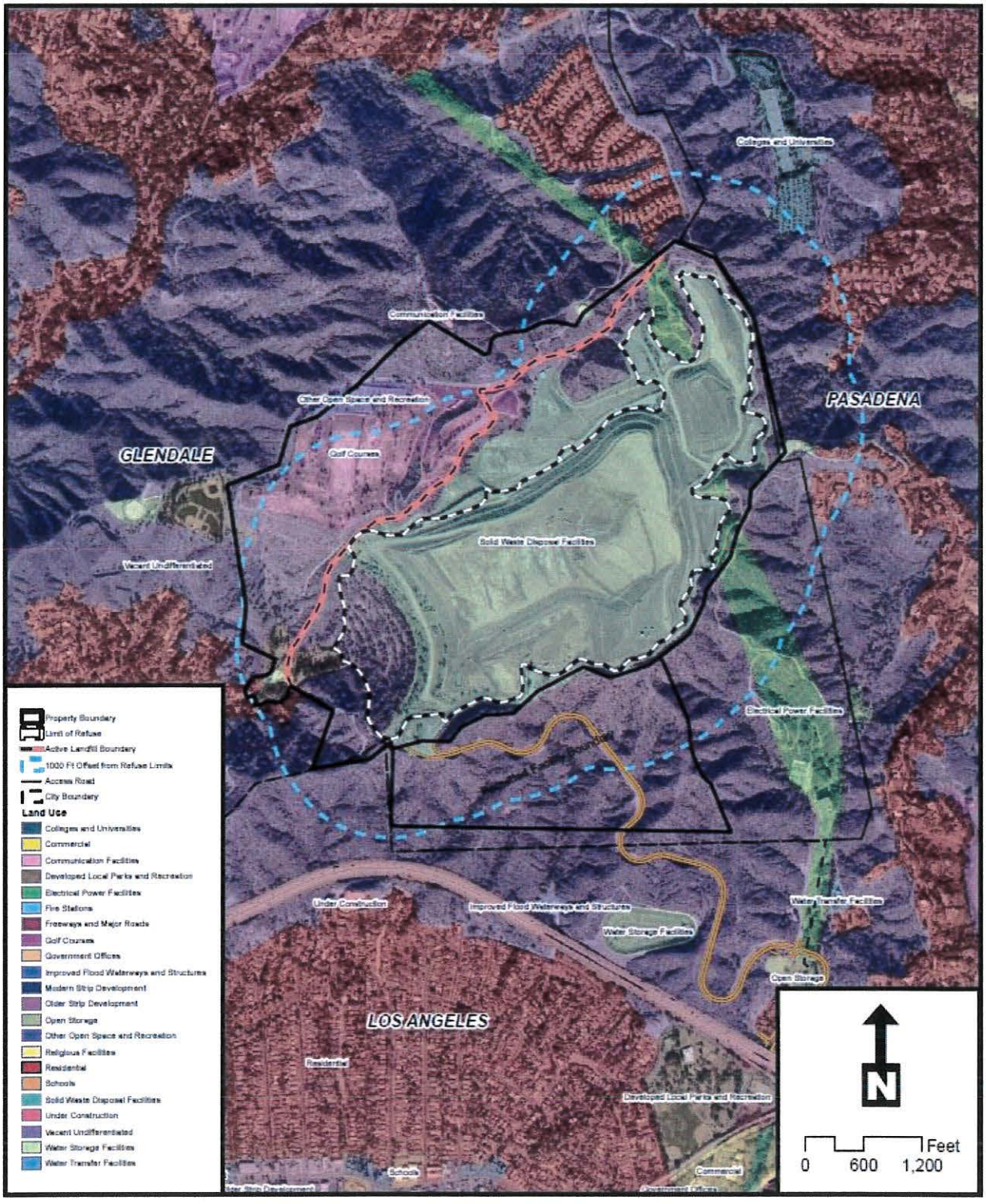

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FIGURE 5:
SURFACE WATER DRAINAGE CONTOUR MAP

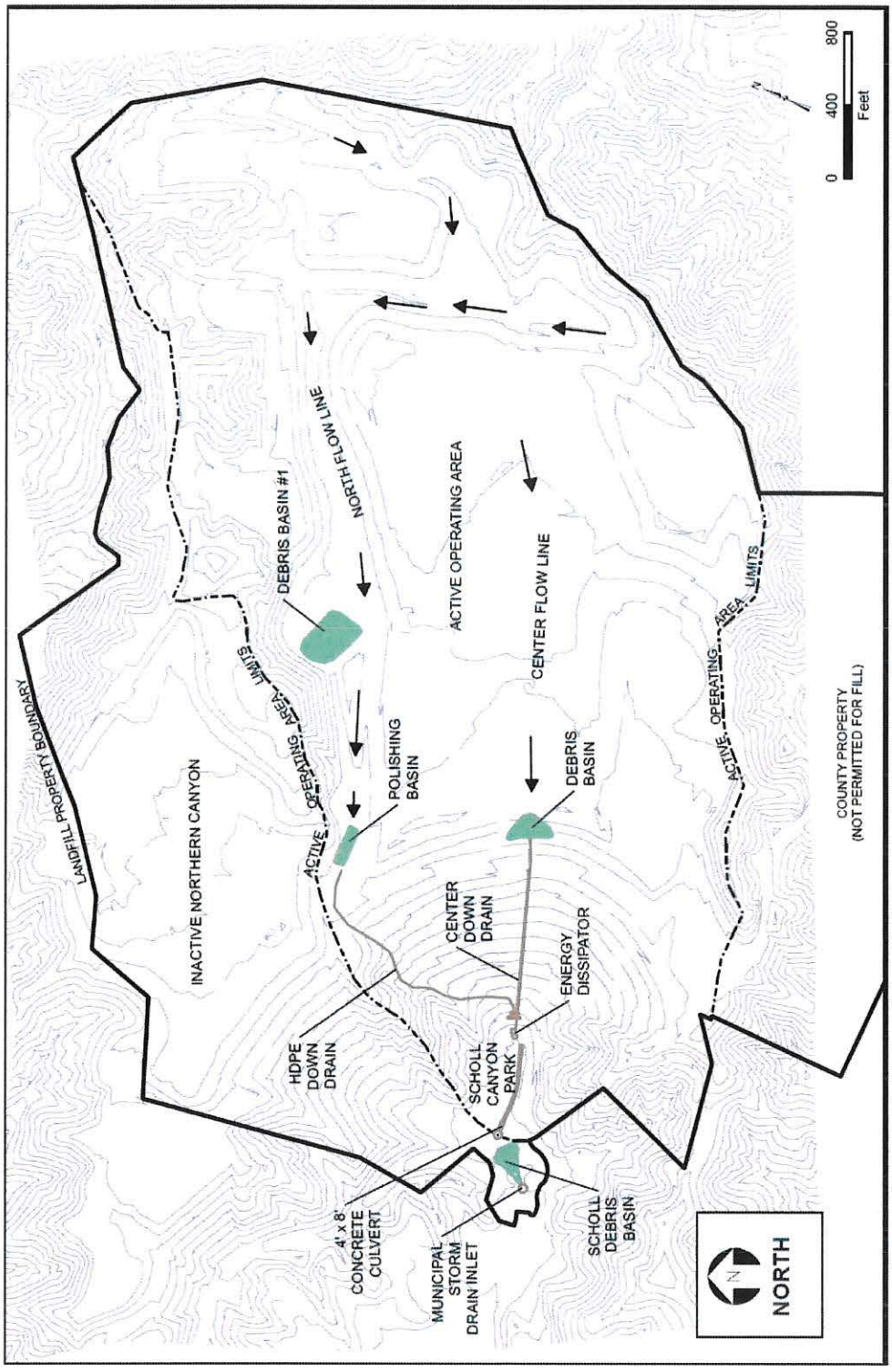

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FIGURE 6:
GROUNDWATER SEEPAGE COLLECTION LOCATION

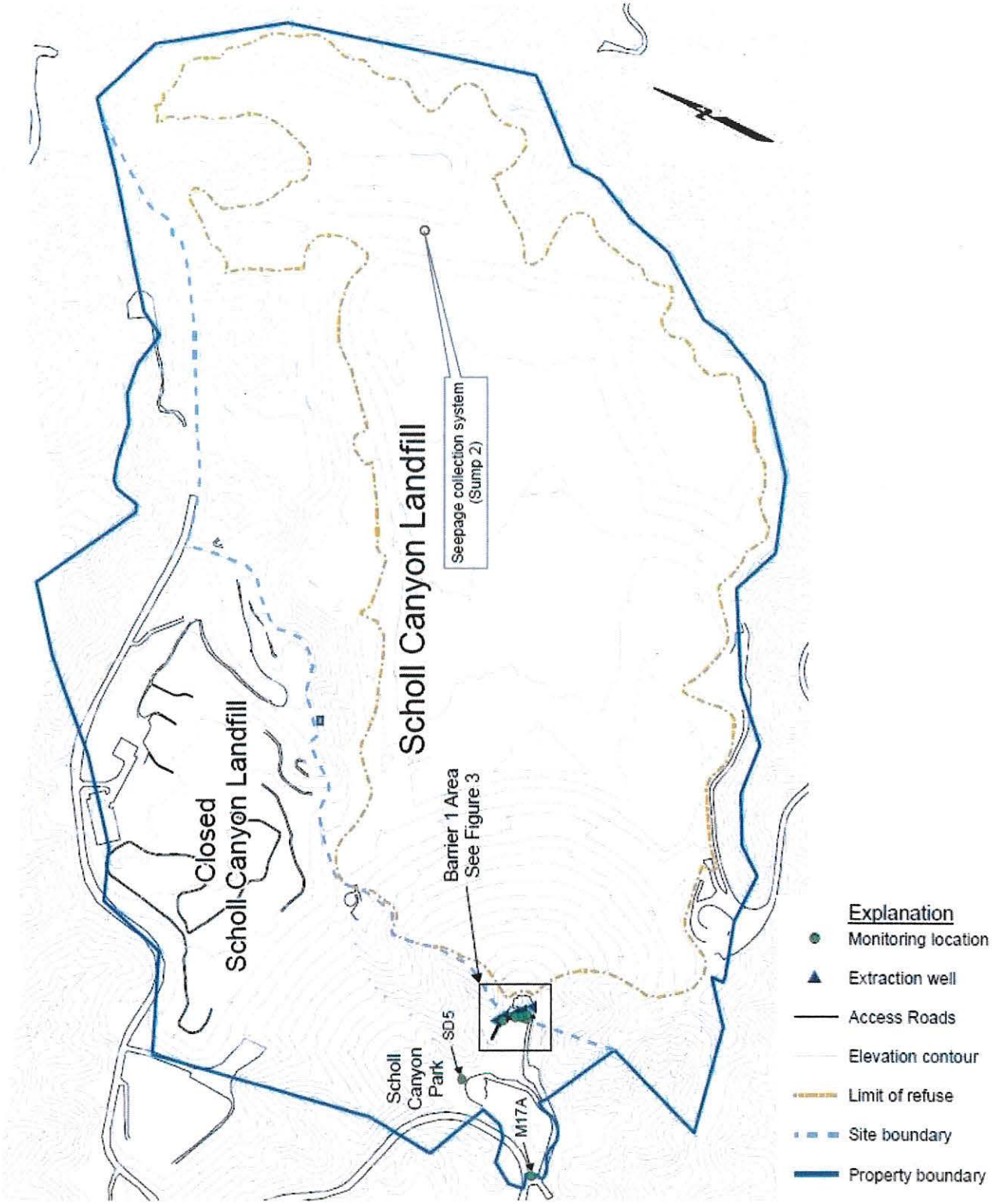

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FIGURE 7:
GROUNDWATER BARRIER AND GROUNDWATER WELLS

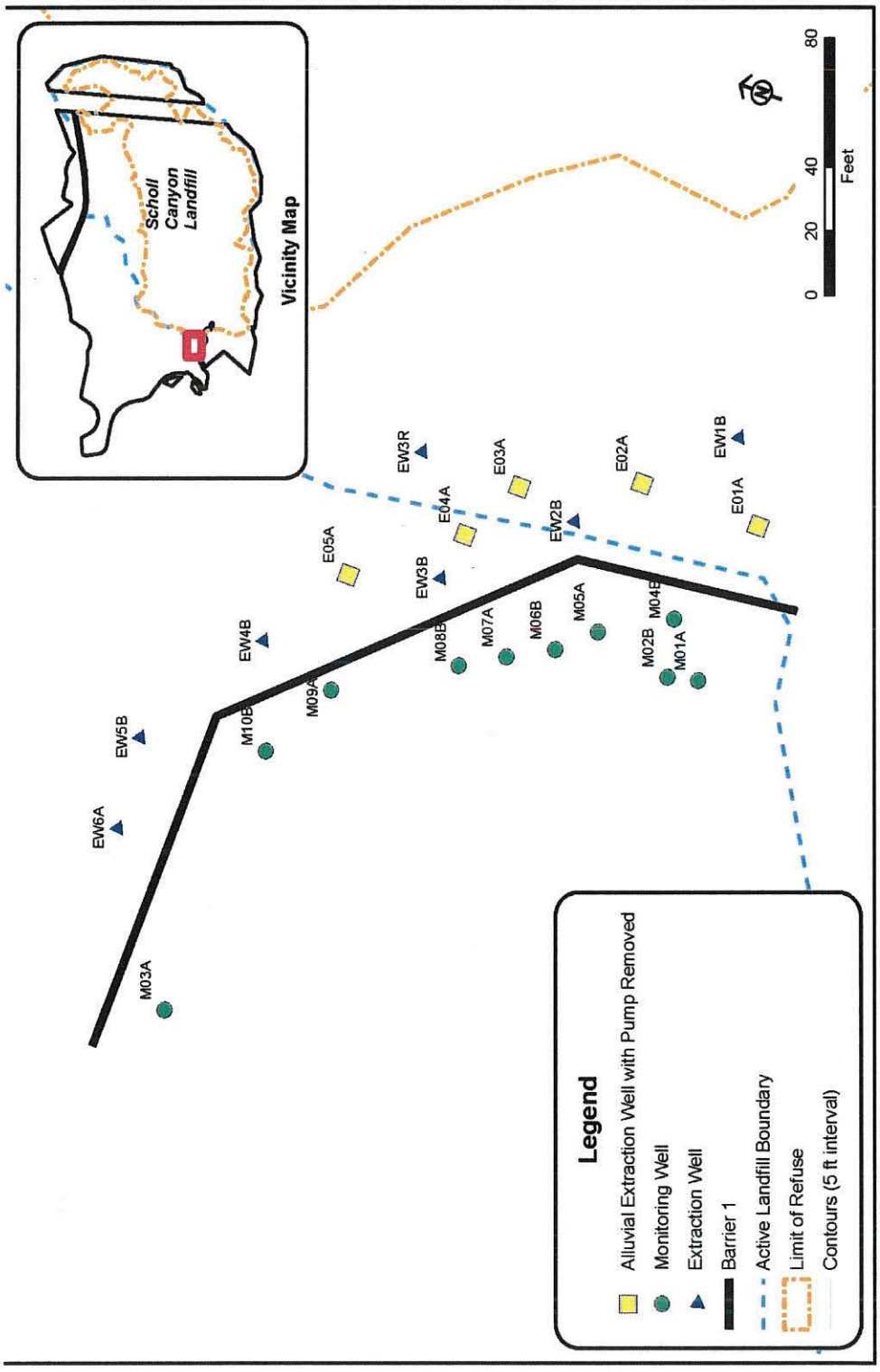

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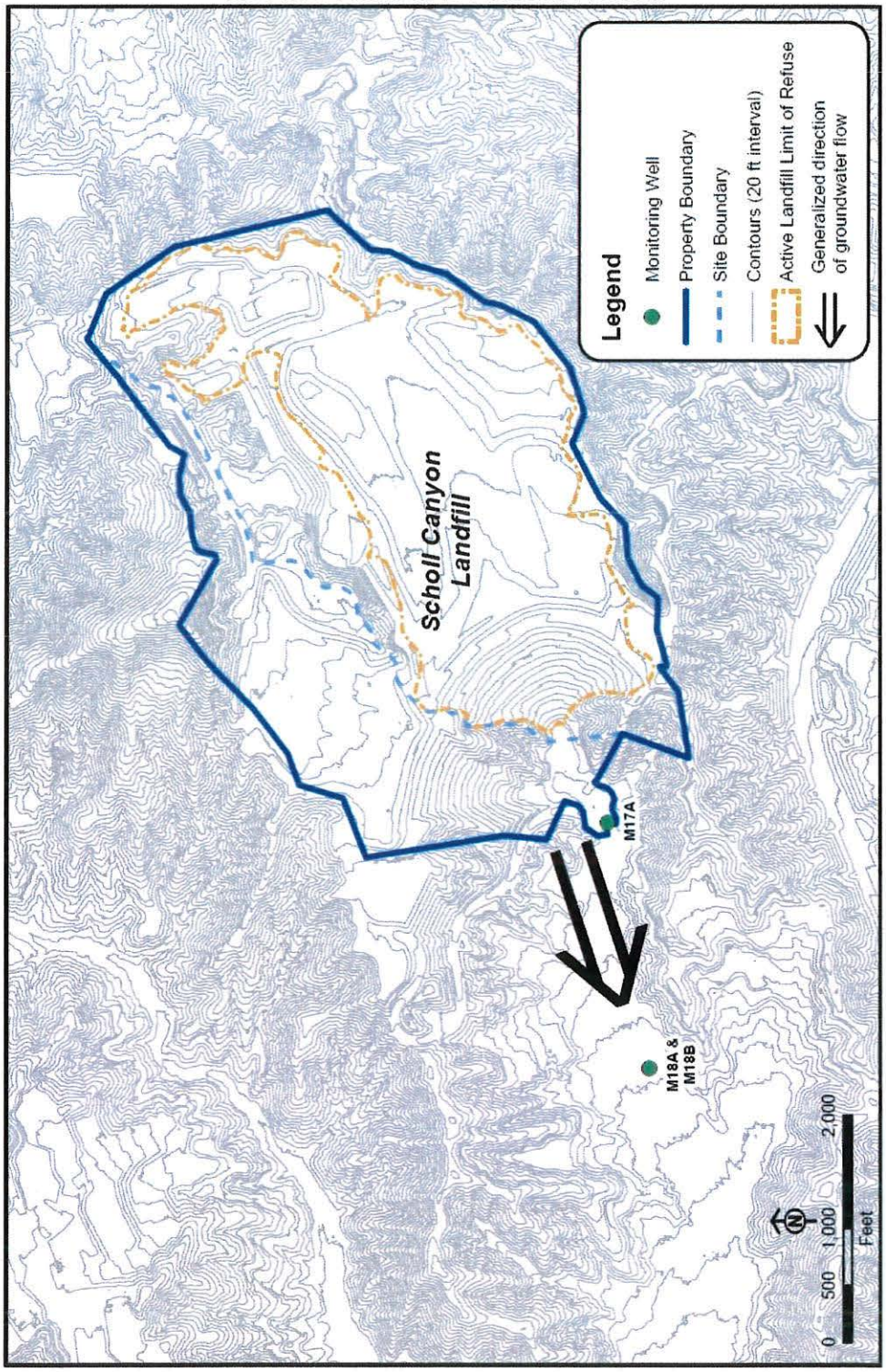
FIGURE 8:
OFF SITE GROUNDWATER WELLS



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STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM (NO. CI-2846)

FOR
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY
(SCHOLL CANYON LANDFILL)

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A. GENERAL

1. This Monitoring and Reporting Program (MRP, No. CI-2846) is issued by the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board), to the County Sanitation Districts of Los Angeles County (Discharger) for the Scholl Canyon Landfill (Landfill) pursuant to California Water Code (CWC) section 13267(b). The MRP is part of Order No. **R4-2019-0xxx** (Order), adopted by the Regional Water Board on March 14, 2019, that implements the requirements of Title 27 of the California Code of Regulations (Title 27), Title 40 of the Code of Federal Regulations, Part 258, and State Water Resources Control Board (State Water Board) Resolution No. 93-62, and the CWC.

2. The principal purpose of a self-monitoring program by a waste discharger is:

   a. To document compliance with discharge requirements and prohibitions established by the Regional Water Board;

   b. To facilitate self-policing by the waste discharger in the prevention and abatement of pollution arising from waste discharge; and

   c. To prepare water quality analyses.

3. The Discharger shall implement this MRP at the Landfill as required in the Order, starting the first monitoring period immediately following adoption of the Order.

4. The Discharger shall comply with the requirements of Title 27 section 20415 for any water quality monitoring program developed to satisfy Title 27 sections 20420, 20425, or 20430, as required in the Order, including this MRP.

   a. Groundwater monitoring shall meet the requirements of Title 27 section 20415(b) and 40 CFR section 258.51 (a, c, and d);

   b. Surface water monitoring shall meet the requirements of Title 27 section 20415(c) and NPDES requirements, as required in the State Water Resources Control Board (State Water Board) NPDES General Permit for Storm Water Discharges Associated with Industrial Activities (NPDES No. CAS000001).

B. REQUIRED REPORTS AND CONTINGENCY RESPONSE

The Discharger shall submit the following reports to the State Water Board GeoTracker database system (Global ID L10009414153) in accordance with the schedules specified.

1. Semi-Annual Monitoring Report

A written monitoring report shall be submitted semi-annually by ~~July~~ August 31 (for the period from January 1 to June 30) and ~~January 31~~February 28 (for the period from July 1 to December 31) of each year. Any reporting or tabulation requirements less than semi-annual in length (i.e., monthly or quarterly) shall be submitted in corresponding semi-annual reports. Semi-annual reports shall include, but shall not be limited to, the following items and sequence:

a. Transmittal Letter: A letter transmitting the essential points of compliance with the Order shall accompany each report. The letter shall include a discussion of any violations found since the last such report was submitted and shall describe actions taken or planned for correcting those violations. If the Discharger has previously submitted a description of planned actions and a time schedule for correcting said violations, a reference to the correspondence transmitting the planned actions and corresponding schedule shall satisfy this requirement. If no violations have occurred since the last submittal, this shall be stated in the transmittal letter. Monitoring reports and the letter transmitting the monitoring reports shall be signed and certified in accordance with Section I.11 of the Order.

b. Summary of Non-Compliance: The report shall identify all violations and describe the corrective action(s) taken or planned, including the schedule(s) for the corrective action(s) to bring the discharge into full compliance with the waste discharge requirements. Significant aspects of any on-going corrective action measures conducted during the monitoring period shall also be described. This section shall be located at the front of the report and shall clearly list all non-compliance with discharge requirements as well as all exceedances of water quality protection standards.

c. Site Conditions: General discussion of site conditions (geology, climate, 100-year 24-hour storm, and watershed specifics, etc.) relative to water quality monitoring.

d. Narrative Description: A narrative discussion of the various monitoring activities and results for the site. Each requirement of Section C (Required Water Quality Monitoring and Inspection Program) of this MRP shall be specifically discussed.

e. Laboratory Results: All monitoring analytical data obtained during the monitoring period shall be presented in tabular form and submitted to GeoTracker in Electronic Deliverable Format (EDF). Statements demonstrating compliance with Section C (Required Water Quality Monitoring and Inspection Program) of this MRP shall be included. Results of additional water sampling and analyses performed at the Landfill, outside of the requirements of this MRP, shall be summarized and reported. If the results of such additional sampling and analyses have or will be reported under separate cover, a statement shall be included in the monitoring report referencing the separate reporting.

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f. Management of Liquids: A summary of the total volumes, on a monthly basis, of Landfill leachate, gas condensate, and any contaminated subdrain water and groundwater extracted at the site, and how these liquids are handled.

g. Waste Disposal Reporting: Waste disposal activities at the site, including:

i. A tabular list of the estimated average monthly quantities (in cubic yards and tons) deposited each month.

ii. An estimate of the remaining capacity (in cubic yards and tons) and the remaining life of the site in years and months.

iii. A certification that all wastes were deposited in compliance with the Regional Water Board's requirements and that no wastes were deposited outside of the boundaries of the waste management area.

iv. A description of the location and an estimate of the seepage rate or flow of all known seeps and springs at the site.

v. The estimated amount of water used at the waste management area for landscape irrigation, compaction, dust control, etc., during each month. (If a source other than potable water is used, the sources and amounts of water from each source shall also be reported.)

vi. The Discharger shall report all unacceptable wastes inadvertently received at this site and their disposition. The following details shall be included:

A. The source (if known), including the hauler, of the unacceptable wastes and date received and/or discovered.

B. Identification of waste (if known) and the amount of waste.

C. The name and address of the hauler who removed the waste from this site.

D. The ultimate point of disposal for the waste.

E. The Discharger's actions to prevent recurrence of the attempted depositing of unacceptable wastes by this source or individual.

F. If no unacceptable wastes were received (or discovered) during the month, the report shall so state.

h. Map(s): Map(s) or aerial photograph(s) showing waste disposal and monitoring locations, relative physical features, and groundwater contours to the greatest degree of accuracy possible.

2. Annual Summary Report

The Discharger shall submit an annual summary report to the Regional Water Board no later than ~~January 31~~February 28 of each year covering the previous monitoring year, which starts January 1 and ends December 31. This report may be combined with the

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semi-annual report that is due on ~~January 31~~February 28 of each year. The annual summary report shall include at least the following:

a. Discussion: Include a comprehensive discussion of the compliance record, any significant monitoring system and operational changes, a summary of corrective action results and milestones, and a review of construction projects, with water quality significance, completed or commenced in the past year or planned for the upcoming year.

b. Graphical Presentation of Analytical Data: For each Monitoring Point, submit in graphical format the laboratory analytical data for all samples taken within at least the previous eight calendar years. Each such graph shall plot the concentration of one or more constituents over time for a given monitoring point, at a scale appropriate to show trends or variations in water quality. Maximum contaminant levels (MCLs) shall be graphed along with constituent concentrations where applicable. Graphs shall plot each datum, rather than plotting mean values.

c. Map(s): Map(s) showing the areas where any significant events have taken place during the previous calendar year.

d. A drainage control system maintenance report that includes, but is not limited to, the following information:

i. For the previous twelve months, a summary of the adequacy and effectiveness of the drainage control system to collect and divert the calculated volume of precipitation and peak flows resulting from a 100-year, 24-hour storm;

ii. A tabular summary of both new and existing drainage control structures, including the types and completion dates of maintenance activities performed for each of these structures; and

iii. A site map, 11 inches by 17 inches or larger, prepared by either aerial surveillance or a licensed surveyor, indicating the location of the elements listed in Section 2.d.*ii* above, and the flow direction of all Landfill drainage. The map shall be updated at least annually.

3. Contingency Response

a. Leachate Seep: The Discharger shall, within 24 hours of discovery, report to Regional Water Board staff by telephone any previously unreported seepage from the Landfill. A written report shall be filed with the Regional Water Board within seven days, and contain at least the following information:

i. Map - A map showing the location(s) of seepage.

ii. Flow rate - An estimate of the flow rate.

iii. Description - A description of the nature of the discharge (e.g., all pertinent observations and analyses).

iv. Location - Location of sample(s) collected for laboratory analysis, as appropriate.

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v. Corrective measures - approved (or proposed for consideration) by the Regional Water Board Executive Officer.

b. Response to an Initial Indication of a Release: Should the initial statistical or non-statistical comparison indicate that a release is tentatively identified, the Discharger shall:

i. Within 24 hours, verbally notify the designated Regional Water Board staff contact as to the monitoring point(s) and constituent(s) or parameter(s) involved;

ii. Provide written notification within seven days of such determination; and

iii. Do either of the following:

A. Carry out a discrete re-test in accordance with Section C.2.h.*ii* of this MRP.[1] If the re-test confirms the existence of a release or the Discharger fails to perform the re-test, the Discharger shall carry out the release discovery response requirements in Section B.3.d and B.3.e (if applicable). In any case, the Discharger shall inform the Regional Water Board of the re-test outcome within 24 hours of validated results becoming available, following up with written results submitted within seven days, or

B. Make a determination, in accordance with Title 27 section 20420(k)(7) that a source other than the waste management unit caused the evidence of a release or that the evidence is an artifact caused by an error in sampling, analysis, or statistical evaluation or by natural variation in the groundwater, surface water, or the unsaturated zone.

c. Physical Evidence of a Release: If either the Discharger or the Regional Water Board Executive Officer determines that there is significant physical evidence of a release (Title 27 section 20385(a)(3)), the Discharger shall conclude that a release has been discovered and shall:

i. Within seven days, notify the Regional Water Board of this fact (or acknowledge the Regional Water Board's determination).

ii. Carry out the requirements of Section B.3.d and B.3.e (if applicable) for all potentially affected monitored media.

iii. Carry out any additional investigations stipulated in writing by the Regional Water Board Executive Officer for the purpose of identifying the cause of the release.

d. Release Discovery Response: If either the Discharger or the Regional Water Board Executive Officer concludes that a release has been discovered, the following steps shall be carried out:

T E N T A T I V E

[1] In case the discrete re-test is triggered by detections of common laboratory contaminants (i.e., acetone, toluene, methylene chloride, and carbon disulfide) the Discharger may postpone the discrete re-test until after the next semi-annual monitoring event. Re-testing for constituents that are common laboratory contaminants will not be required unless the same pollutants are detected in the following semi-annual monitoring event.

i. If this conclusion is not based upon monitoring for all constituents of concern (COCs), the Discharger shall sample for all COCs at all monitoring points in the affected medium (i.e. groundwater). Within seven days of receiving the laboratory analytical results, the Discharger shall notify the Regional Water Board Executive Officer of the concentration of all COCs at each Monitoring Point. This notification shall include a synopsis showing, for each monitoring point, those constituents that exhibit an unusually high concentration.

ii. The Discharger shall, within 90 days of discovering the release, submit an amended report of waste discharge proposing an evaluation monitoring program (EMP) that:

A. Meets the requirements of Title 27 sections 20420 and 20425.

B. Satisfies the requirements of 40 CFR section 258.55(g)(1)(ii) by installing at least one monitoring well at the facility boundary directly downgradient of the center of the release.

iii. The Discharger shall, within 180 days of discovering a release, submit a preliminary engineering feasibility study for a corrective action program necessary to meet the requirements of Title 27 section 20430.

iv. The Discharger shall immediately begin delineating the nature and extent of the release by installing and monitoring assessment wells as necessary to assure that it can meet the requirements of Title 27 section 20425 to submit a delineation report within 90 days of when the Regional Water Board Executive Officer directs the Discharger to begin the EMP.

e. Release Beyond Facility Boundary: If the Discharger or Regional Water Board Executive Officer concludes that a release from the Landfill has proceeded beyond the facility boundary, the Discharger shall so notify all persons who either own or reside upon the land that directly overlies any part of the plume (Affected Persons) as follows:

i. Initial notification to Affected Persons shall be accomplished within 14 days of making this conclusion and shall include a description of the Discharger's current knowledge of the nature and extent of the release.

ii. Subsequent to initial notification, the Discharger shall provide updates to all Affected Persons, including any persons newly affected by a change in the boundary of the release, within 14 days of concluding there has been any material change in the nature or extent of the release.

iii. Each time the Discharger sends a notification to Affected Persons (under Sections 3.e.*i.* or 3.e.*ii*, above), it shall, within seven days of sending such notification, provide the Regional Water Board with both a copy of the notification and a current mailing list of Affected Persons.

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4. Submitting of Reports

a. The Discharger shall submit all scheduled reports required in the Order, including those required by this MRP, pursuant to electronic submittal of information (ESI) reporting requirements, or as directed by the Regional Water Board Executive Officer. Until directed otherwise by the Regional Water Board Executive Officer, all reports shall be submitted to the State Water Board GeoTracker data system in searchable Portable Document Format (PDF) files (Geotracker Global ID. L10009414153). In addition, all groundwater analytical data and monitoring well locations shall be submitted to GeoTracker in EDF. Documents that cannot be conveniently reviewed in electronic format, such as large maps or drawings, shall be submitted as hard copies to the Regional Water Board office as instructed by Regional Water Board staff.

b. All reports required in this MRP shall be addressed to:

California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, California 90013
ATTN: Land Disposal Unit

C. REQUIRED WATER QUALITY MONITORING AND INSPECTION PROGRAM

The Discharger shall conduct the following water quality monitoring and inspection program at the Landfill. Unless otherwise indicated, all monitoring data and inspection results shall be reported to the Regional Water Board as outlined in Section B (Required Reports and Contingency Response) of this MRP. In addition, Regional Water Board staff may conduct appropriate verification tests to confirm the accuracy of the Discharger's self-monitoring.

1. Environmental Monitoring Networks

The Discharger shall conduct analytical monitoring of groundwater~~,~~ and surface water~~, leachate, and the vadose (unsaturated) zone~~ at the Landfill. The current environmental monitoring points for the Landfill are summarized in Table A-1 and their locations are displayed on Figures A-1 and Figure A-2.

2. Water Quality Monitoring

a. Initial Full Appendix II Scan[2]: Within 30 days of the adoption of this Order, all downgradient groundwater monitoring points where a full Appendix II scan has not been performed within the last five years shall be sampled and analyzed for the presence or absence of all Appendix II constituents that are not yet on the Landfill's monitoring parameter (MPar) list. A full Appendix II scan shall also be performed at any new groundwater monitoring well within thirty days of its installation. For any Appendix II constituent detected in the scan that is not yet on the Landfill's MPar list, the Discharger shall resample for that constituent, within ninety days, at all monitoring points where the constituent(s) was detected. Any Appendix II constituent that is detected and confirmed at one or more groundwater monitoring points becomes a new

[2] An Appendix II Scan refers to a laboratory test that includes the analyses of all constituents listed in 40 CFR Part 258 Appendix II.

COC for the Landfill and shall be added to the Landfill's MPar list, pursuant to 40 CFR Part 258.55(b-d).

b. COC List: As of the date of this MRP, the COC list for the Landfill consists of all those constituents listed in Table A-2. At any subsequent time, the COC list shall include: all Appendix II constituents detected and confirmed in the initial scan under Section C.2.a~~, all Appendix II constituents that have been detected and confirmed in the leachate scan required by this MRP,~~ and any constituent added by the Regional Water Board Executive Officer. The Discharger shall notify Regional Water Board staff of any such new addition to the COC list immediately, via phone, fax, or e-mail, shall note it in the Landfill's operating record within fourteen days of the verification, and shall report the addition of constituent(s) to the COC list in the next scheduled monitoring report.

c. MPars: Current groundwater MPars at the Landfill are listed in Table A-2, including:

i. Indicator Parameters: These constituents are considered capable of providing reliable indication of a release from the Landfill. The Discharger shall apply the statistical analysis described in Section C.2.g or non-statistical analysis in Section C.2.h of this MRP to all groundwater monitoring data for indicator parameters obtained from all downgradient groundwater monitoring wells monitored pursuant to this MRP.

ii. Supplemental Parameters: These are inorganic constituents that provide important information regarding groundwater geochemistry but may not show significant variation in concentrations in groundwater in the event of a Landfill release. Monitoring data for supplemental parameters will generally be used to differentiate between any distinct groundwater aquifers and will not be subjected to routine statistical analysis.

iii. Other COCs: These include trace metals or other pollutants that have been detected and confirmed ~~to be in leachate from the Landfill~~pursuant to Section C.2.b of this MRP or added by the Regional Water Boards Executive Officer.

d. Water Quality Protection Standards (WQPS): In accordance with Title 27 section 20390, the WQPS for the Landfill are established as natural background groundwater quality at the site, which is either the statistically predicted value (if the constituent exists naturally) or the laboratory detection limit (if the constituent does not naturally exist in groundwater).

e. Development and Updating of Concentration Limits: The Discharger shall develop and submit to the Regional Water Board for the Executive Officer's approval, all Concentration Limits following the procedures provided in Section C.2.g. of this MRP. The revised concentration limits shall be submitted with the next semi-annual report, following the adoption of Regional Water Board Order No. R4-2019-00XX. The Discharger shall continue to develop and update concentration limits following the procedures provided in Section C.2.g.*i* of this MRP. The Discharger shall review concentration limits biannually in annual reports submitted to the Regional Water Board. When appropriate, new concentration limits shall be proposed. For any well/Mpar pair for which an intra-well comparison analysis is not applicable, the Discharger shall use an inter-well comparison analysis to determine whether water quality protection standards are violated.

f. Groundwater Quality Monitoring – The Discharger shall conduct the following groundwater monitoring activities at the Landfill:

i. Semi-annual monitoring shall be conducted at all downgradient groundwater monitoring wells listed on Table A-1 and shall be analyzed for all indicator parameters and supplemental parameters on a semi-annual basis (in ~~April~~ February and ~~October~~August) and all other COCs on an annual basis (in October).

ii. Five-Year COC Scan — Every five years, starting in 2021, the Discharger shall analyze a sample from all downgradient groundwater monitoring wells for the detectable presence (including trace determinations) of all COCs that are not yet on the MPar list. This constitutes the means by which the Discharger continues to meet the requirements of 40 CFR section 258.55(b)-(d).

A. During each such COC scanning event, the Discharger shall obtain and analyze a minimum of one sample from each monitoring well (sufficient to obtain a datum for each COC that is subject to the scan). Upon detecting (including trace value) a COC that is not yet on the MPar list, the Discharger shall, within thirty days, take a single resample from the monitoring well(s) from which the sample was taken and reanalyze it only for the newly-detected constituent(s).

B. Any COC detected in samples collected from a groundwater monitoring well, and verified by a retest, automatically becomes part of the MPar list for the facility. This constitutes the means by which the Discharger shall meet the requirements of 40 CFR section 258.55(d)(2).

g. Statistical Data Analysis Methodology

i. Intra-well comparison methods shall be used for all compliance wells for all constituents that are detectable at concentrations above their respective method detection limit (MDL)[3] in ten percent or more of the background data to date. Initially, for each given MPar at a given downgradient monitoring well (well/MPar pair), the proposed background data set shall consist of all validated data from that compliance well and parameter, from the preceding five-year period. Every two years, following the adoption of this MRP, as part of the annual monitoring summary report, the Discharger shall add the newer data to the background data set for each well/MPar pair after validating (via a method approved by the Regional Water Board Executive Officer) that the new data does not indicate an increase over the existing background data. At that time, the Discharger shall also retire the well/MPar's oldest two years of background data, thereby producing a data set covering the previous five years. The Discharger shall validate the proposed intra-well background data set as follows for each MPar at each well (initially) or, subsequently, at a new well or for a new MPar at an existing well. The Discharger shall report the validated or updated background data set for each affected well/MPar pair in the next scheduled monitoring report. The Discharger may use

[3] *Whenever a chemical is detected at a concentration above the MDL but below the practical quantitation limit (PQL), the Minimum Level (ML), which is defined as the lowest quantifiable concentration in a sample based upon the proper application of analytical procedures and the absence of any matrix interference, shall be used.*

an alternative statistical method or approach for development of concentration limits, if approved by Regional Water Board staff.

ii. Per Title 27 section 20415(e)(9)(C), if a control chart approach is used to evaluate water quality monitoring data, the specific type of control chart and its associated statistical parameter values (e.g., the upper control limit) shall be included in the supporting documentation as required by Title 27 section 20415(e)(7). The Discharger shall use the procedure only if this supporting documentation shows the procedure to be protective of human health and the environment. Any control charting procedure must have a false positive rate of no less than 1 percent for each monitoring point charted. For example, upper control limits on X-bar or R-Charts used only once every six months (where no composite retest is used) must be set at no more than 2.327 standard deviations of the statistic plotted for a one-sided statistical comparison, or at no more than 2.576 standard deviations of the statistic plotted for a two-sided statistical comparison.

iii. In the event that an approved data analysis method provides a preliminary indication that a given MPar has a measurably significant increase at a given well, the Discharger shall conduct a verification procedure (retest) in accordance with Title 27 section 20415(e)(8)(E). To maintain sample independence, the retest sampling shall be conducted within 90 days of the initial sampling event and can be coordinated with the corresponding semi-annual sampling event. The verification procedure shall be performed only for the constituent(s) or parameter(s) that has shown "measurably significant" (as defined by Title 27 section 20164) evidence of a release and shall be performed only for those monitoring points at which a release is indicated.

iv. For any COC or MPar that is detectable at concentrations above its respective MDL in 10% or less of the background data to date, the constituent's concentration limit shall be its MDL. A measurable exceedance of this concentration limit shall be determined by application of the non-statistical analysis method described in Section C.2.h of this MRP.

v. Water Quality Monitoring Approach — Except for COC scans, the monitoring approach used for each MPar at all compliance wells (well/MPar pair) shall be controlled by whether that MPar has exhibited a measurably significant increase at that well. Therefore, the Discharger shall monitor each well/MPar pair in one of two modes, as follows, either:

A. Detection Mode - For an MPar that has not produced a measurably significant increase at that well, the purpose of monitoring for that well/MPar pair is to watch for the MPar's arrival at that well at a concentration strong enough to trigger a measurably significant indication using an appropriate statistical or nonstatistical data analysis method; or

B. Tracking Mode - For an MPar that has produced a measurably significant increase at a given well, the purpose of the monitoring for that well/MPar pair is to verify the suitability and effectiveness of the existing or proposed corrective measures by tracking changes in the MPar's concentration at that location via an evolving concentration-versus-time plot.

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vi. Detection Mode Data Analyses — The following applies to all detection mode data analyses (i.e., this section does not apply to the scans under Sections C.2.a or C.2.f.*ii*):

A. MPars Readily Detectable in Background — At any given monitoring point, the Discharger shall apply an appropriate statistical analysis for each detection mode MPar that exceeds its respective MDL in at least 10% of the applicable background data set;

B. MPars Not Readily Detectable in Background — For any monitoring point at which one or more MPars, in detection mode, exceed their respective MDL in less than 10% of the applicable background data set, the Discharger shall analyze the data for these MPars via the California Non-statistical Data Analysis Method (CNSDAM) test described in Section C.2.h of this MRP.

h. California Non-statistical Data Analysis Method (CNSDAM)

i. Non-Statistical Method for Detection Mode for MPars Seldom Found in Background - For any given compliance (downgradient) well, regardless of the monitoring program (DMP, EMP, AMP, or CAP), the Discharger shall use this data analysis method, jointly, for all constituents on the "scope list" in Section C.2.h.*i*.A of this MRP (or, for each retest sample, the modified scope list of Section C.2.h.*ii*.B).

A. Scope List – Within 30 days of the effective date of this Order, the Discharger shall create a current "scope list" showing each detection mode MPar, at that well, that exceeds its MDL in less than 10% of its background data.

B. Two Triggers - From the scope list made under Section C.2.h.*i*.A, for an initial test (or, for a retest, the modified scope list under Section C.2.h.*ii*.B), the Discharger shall identify each MPar in the current sample from that well that exceeds either its respective MDL or PQL. The Discharger shall conclude that these exceeding MPars provide a preliminary indication that a given MPar has a measurably significant increase at a given well (or, for a retest, provide a measurably significant indication) of a change in the nature or extent of the release, at that well, if either:

(a) Two or more of the MPars on a monitoring well's scope list exceed their respective MDL; or

(b) At least one of the MPars on a monitoring well's scope list equals or exceeds its respective PQL.

ii. Discrete Retest [Title 27 section 20415(e)(8)(E)]:

A. In the event that the Discharger concludes (pursuant to Section C.2.h.*i*.B) that there is a preliminary indication that a given MPar has a measurably significant increase at a given well, then the Discharger shall immediately notify Regional Board staff by phone, fax, or e-mail and, within 30 days of such indication, shall collect two new (re-test) samples from the indicating compliance well. To

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maintain sample independence, the retest sampling shall be conducted within 90 ~~to 100~~ days of the initial sampling event.

B. For any given compliance well, the Discharger shall analyze the retest samples only for those constituents indicated in that well's original test, under Section C.2.h.*i*.B of this MRP, and these constituents shall comprise the well's "modified scope list." As soon as the retest data are available, the Discharger shall apply the same test (under Section C.2.h.*i*.B, but using this modified scope list) to separately analyze each of the two suites of retest data at that compliance well.

C. If either (or both) of the retest samples trips either (or both) of the triggers under Section C.2.h.*i*.B, then the Discharger shall conclude that there is a measurably significant increase at that well for the constituent(s) indicated in the validating retest sample(s). Furthermore, thereafter, the Discharger shall monitor the indicated constituent(s) in tracking mode at that well, remove the constituent(s) from the scope list created for that well, notify the Regional Water Board in writing, and highlight this conclusion and these changes in the next scheduled monitoring report and in the Landfill's operating record.

i. Groundwater Flow Direction – the Discharger shall measure the water level in each well listed in Table A-1 at least ~~quarterly~~ semi-annually and determine the presence of horizontal and vertical gradients and groundwater flow rate and direction for the respective groundwater body. The Discharger shall determine groundwater flow direction by water level readings monitoring wells listed in Table A-1.

~~j. Leachate Monitoring – The Discharger shall conduct leachate monitoring at all leachate collection sumps at the Landfill as follows:~~

~~*i.* Annual Appendix II Constituent Scan - Leachate samples shall be taken at each monitoring point each year during the month of September. The samples shall be analyzed for all Appendix II Constituents in 40 CFR part 258.~~

~~*ii.* Retest - If any constituents that are not in the COC list are detected in the leachate sampling event at any sampling point, the Discharger shall resample the leachate at that point in March and analyze the sample for those detected constituents. If any such constituent is confirmed to be in the leachate, the Discharger shall add the constituent to the COC list and report this to the Regional Water Board within two weeks of the confirmation.~~

~~*iii.* Reporting - Leachate monitoring results shall be included in the semi-annual and annual report that covers the period during which the monitoring is conducted.~~

~~k.~~j. Vadose Zone Monitoring – Vadose zone monitoring at the Landfill shall be conducted semi-annually and include:

i. Landfill Gas Monitoring - The Discharger shall include in the semi-annual reports all monthly gas probe monitoring results conducted in accordance with South Coast Air Quality Management District Rule 1150.1. If Landfill-related gases are detected above a methane gas concentration in excess of five percent by volume, the Discharger shall implement the following program:

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a. Perform an evaluation to determine the source of the methane (i.e., thermogenic due to local natural petroleum deposits or landfill-related). If the methane is determined to be thermogenic, no action related to the groundwater program will be necessary.

b. If the evaluation of methane source indicates that it is Landfill-related, the Discharger shall sample the nearest groundwater monitoring well listed in Table A-1 and complete applicable provision of groundwater monitoring well sampling and analysis for Appendix I VOCs, as described in Section C.2 of this MRP for downgradient groundwater monitoring wells.

~~l.~~k. Surface Water Monitoring – Surface water monitoring is not required in this MRP because requirements for monitoring runoff at the Landfill are contained in the NPDES General Permit for Storm Water Discharges from Industrial Activities and Regional Water Board Order No. R4-2011-0052, to which the Landfill is subject.

~~m.~~l. Water Used on Site for Irrigation and Dust Control: The Discharger shall record the amount of water used on site for the purposes of irrigation and dust control from each source on a monthly basis. Each wastewater source that is used for irrigation and dust control, other than potable water and recycled water that meets the standards of Title 22 of the California Code of Regulations, shall be sampled quarterly and analyzed for pH, heavy metals, nitrate, total organic carbon, oil and grease, and VOCs.

3. **Site Inspections**

The Discharger shall inspect the Landfill in accordance with the following schedule, and, at a minimum, shall include the standard observations listed in section C.3.c below.

a. During the wet season (October through April), following each storm that produces storm water runoff or on a monthly basis if no storm produces runoff during the month.

b. During the dry season, a minimum of one inspection shall be performed every three months.

c. Standard Observations during a site inspection shall include at least the following:

i. Evidence of any surface water leaving or entering the waste management unit, estimated size of affected area, and estimated flow rate (show affected area on map).

ii. Evidence of odors; presence or absence, characterization, source, and distance of travel from source.

iii. Evidence of erosion and/or of exposed refuse.

iv. Inspection of all storm water discharge locations for evidence of non-storm water discharges during dry seasons and integrity of the drainage system during wet seasons.

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v. Evidence of ponded water at any point on the waste management facility (show affected area on map).

vi. Compliance with the Storm Water Pollution Prevention Plan, ensuring that the terms of the NPDES General Permit for Storm Water Discharges from Industrial Activities, are properly implemented.

vii. Integrity of all drainage systems.

D. SAMPLING AND ANALYTICAL PROCEDURES

1. Sampling and Analytical Methods

Sample collection, storage, and analysis shall be performed according to the most recent version of Standard USEPA Methods (USEPA publication "SW-846") and in accordance with a sampling and analysis plan acceptable to the Regional Water Board Executive Officer. A State of California approved laboratory, accredited by the State of California Environmental Laboratory Accreditation Program (ELAP), shall perform water analysis. The Regional Water Board Executive Officer may allow use of analytical methods that are not available through ELAP. Specific methods of analysis must be identified. The director of the laboratory whose name appears on the certification shall supervise all analytical work in his/her laboratory and shall sign reports of such work submitted to the Regional Water Board. In addition, the Discharger is responsible for seeing that the laboratory analysis of samples from all monitoring points meets the following restrictions:

a. The methods of analysis and the detection limits used must be appropriate for the expected concentrations. For detection monitoring of any constituent or parameter that is found in concentrations which produce more than 90% non-numerical determinations (i.e., trace) in historical data for that medium, the SW-846 analytical method having the lowest MDL shall be selected.

b. Trace results (results falling between the MDL and the practical quantitation limit (PQL)) for organic compounds shall be reported as such.

c. MDL and PQL shall be derived by the laboratory for each analytical procedure, according to State of California ELAP procedures. Both limits shall reflect the detection and quantitation capabilities of the specific analytical procedure and equipment used by the laboratory. If the laboratory suspects that, due to a change in matrix or other effects, the true detection limit or quantitation limit for a particular analytical run differs significantly from the laboratory-derived values, the results shall be flagged accordingly and an estimate of the limit actually achieved shall be included.

d. For each MPar addressed during a given reporting period, the Discharger shall include in the monitoring report a listing of the prevailing MDL and PQL for that MPar together with an indication as to whether the MDL~~, PQL, or both have~~ has changed since the prior reporting period. The Discharger shall require the analytical laboratory to report censored data (trace level and non-detect determinations). In the event that an MPar's MDL ~~and/or PQL~~ changes, the Discharger shall ~~highlight~~ include that change in the report's summary ~~and the report shall include an explanation for the change that is written and signed by the owner/director of the analytical laboratory~~.

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e. Applicable quality assurance and quality control (QA/QC) data shall be reported along with the sample results. Sample results shall be reported unadjusted for blank results or spike recovery. The QA/QC data submittal shall include:

i. The method, equipment, and analytical detection limits.

ii. The recovery rates, including an explanation for any recovery rate that is outside the USEPA-specified recovery rate.

iii. The results of equipment and method blanks.

iv. The results of spiked and surrogate samples.

v. The frequency of quality control analysis.

vi. The name and qualifications of the person(s) performing the analyses.

f. QA/QC analytical results involving detection of common laboratory contaminants in any sample shall be reported and flagged for easy reference.

g. Non-targeted chromatographic peaks shall be identified, quantified, and reported to a reasonable extent. When significant unknown peaks are encountered, second column or second method confirmation procedures shall be performed in an attempt to identify and more accurately quantify the unknown analyte(s).

2. Records to be Maintained

Analytical records shall be maintained by the Discharger or laboratory and shall be retained for a minimum of five years. The period of retention shall be extended during the course of any unresolved litigation or when directed by the Regional Water Board Executive Officer. These records and reports are public documents and shall be made available for inspection during normal business hours at the Regional Water Board office. Such records shall show the following for each sample:

a. Identity of sample and the actual monitoring point designation from which it was taken, along with the identity of the individual who obtained the sample.

b. Date and time of sampling.

c. Date and time that analyses were started and completed and the name of personnel performing each analysis.

d. Complete procedure used, including method of preserving the sample and the identity and volumes of reagents used.

e. Results of analyses and MDL and PQL for each analysis.

ORDERED BY: _____
Deborah J. Smith

DATE: March 14, 2019

Executive Officer

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TABLE A-1:
Landfill Monitoring Locations

Media Monitored	Monitoring Points	Location
Groundwater	M01A, M02B, M03A, M04B, M05A, M06B, M07A, M08B, M09A, and M10B (near the barrier)	Downgradient
	M17A, M18A, and M18B (off site)	Downgradient Off-site

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TABLE A-2:
Constituents of Concern at the Landfill

Monitoring Parameters (MPars)			Other COCs
Indicator Parameters*		Supplemental Parameters	
Inorganic Parameters: Alkalinity, total Ammonia, nitrogen Chemical oxygen demand (COD) Chloride Nitrate-N Sodium Sulfate Potassium, total Total dissolved solids (TDS) Total organic carbon (TOC)	**Organic Parameters:** **Appendix I VOCs:** ~~1,2-Dichlorobenzene~~ Acetone Benzene Bromodichloromethane Chlorobenzene Chloroform Dichlorodbenzene, Total Ethylbenzene 1,1-Dichloroethane 1,2-Dichloroethane 1,2-Dichloropropane t-1,2-Dichloroethylene Tetrachloroethylene Toluene 1,1,1-Trichloroethane Trichloroethylene Vinyl Chloride **Other Organics:** Dichlorodifluoromethane (DCDFM) Methyl tertiary butyl ether (MTBE) 1,4-Dioxane	Bicarbonate (as $CaCO_3$) Boron, total Bromide Calcium, total ~~Carbon dioxide, lab~~ Fluoride Iron, total Magnesium, total Manganese, total pH, field ~~Sodium, total~~ Sulfide Specific conductance, field Temperature, field Turbidity, field	**Metals:** Antimony Arsenic Barium Beryllium Cadmium Chromium, total Cobalt Copper Lead Mercury Nickel Selenium Silver Thallium Vanadium Zinc **Any other pollutants detected and confirmed in ~~Landfill leachate~~accordance with Section C.2.f.ii of the MRP or added by the Regional Water Board Executive Officer**

*Any modification to the list of Indicator Parameters evaluated through statistical analysis based on source (leachate) concentration or related information must be fully described in each corresponding semi-annual monitoring report.

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FIGURE A-1:
EXISTING COMPLIANCE GROUNDWATER MONITORING LOCATIONS

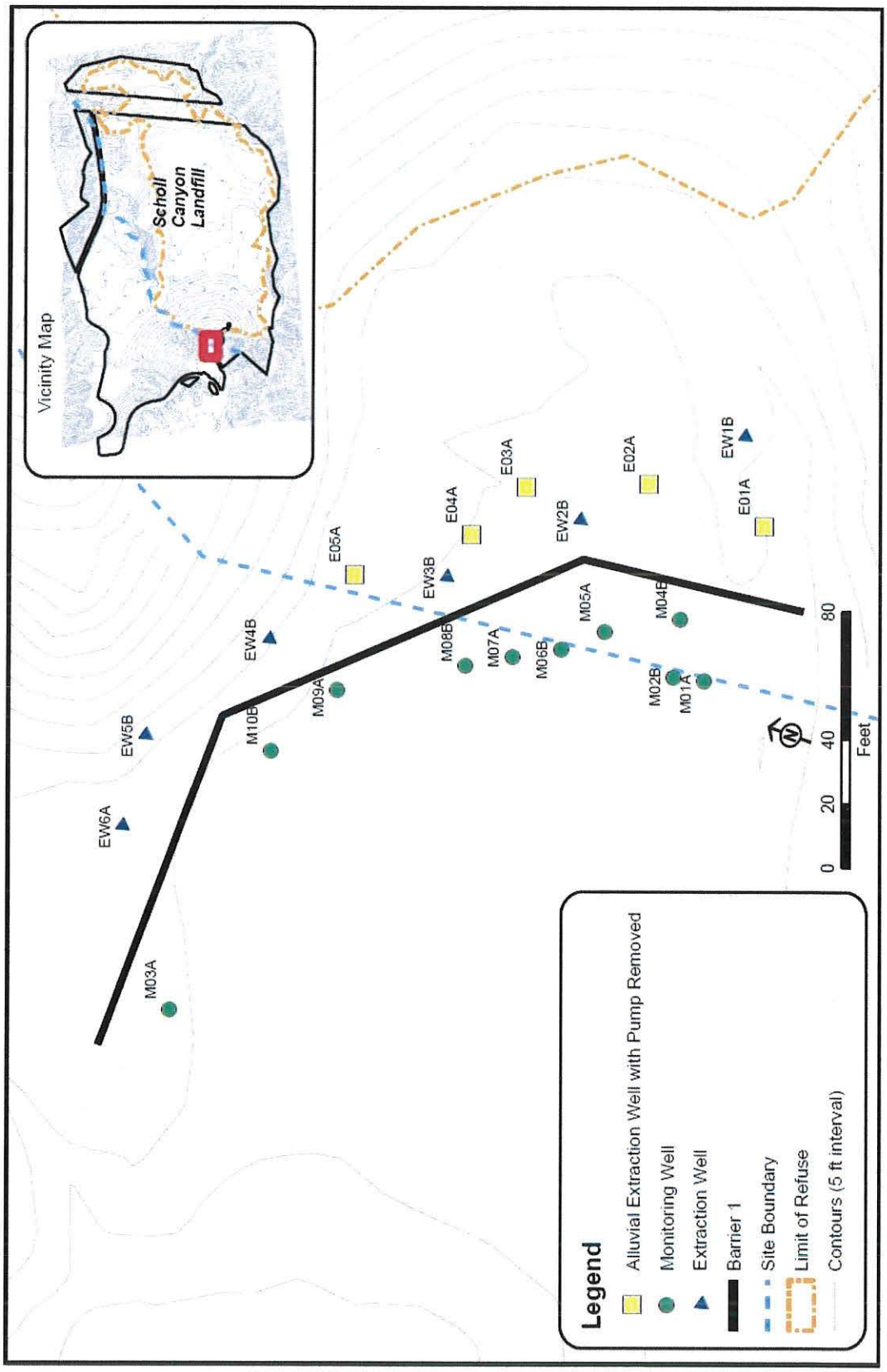

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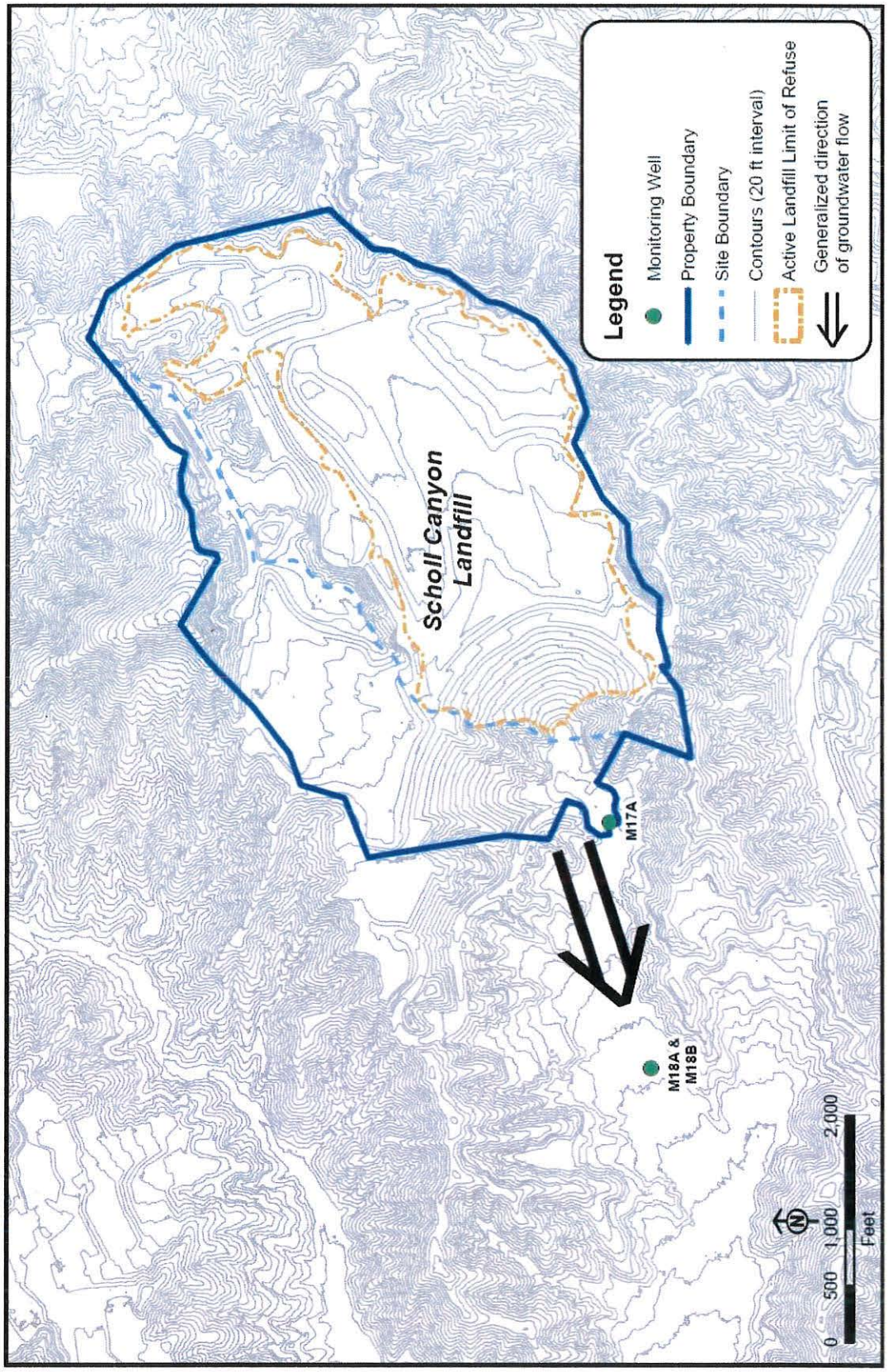
FIGURE A-2:
OFF SITE GROUNDWATER MONITORING LOCATIONS



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