

Los Angeles Regional Water Quality Control Board

May 6, 2013

Mr. Brian Gordon, Director
Compliance and Technical Division
Navy Facility Engineering Command, Southwest
937 Harbor Drive
San Diego, CA 92132-0058

REQUIREMENT OF CORRECTIVE ACTION COST ESTIMATE FOR KNOWN OR REASONABLY FORESEEABLE RELEASES TO WATER – SAN CLEMENTE ISLAND LANDFILL, LOS ANGELES COUNTY, CALIFORNIA (ORDER NO. R4-2010-0045, CI 9585, WDID NO. 4B190703014)

Dear Mr. Gordon:

The San Clemente Island Landfill (Landfill) at the San Clemente Island, Los Angeles County, California, is a municipal solid waste landfill operated by the US Navy Facility Engineering Command, Southwest. The Landfill is regulated under waste discharge requirements (WDRs) included in Order No. R4-2010-0045 adopted by the Los Angeles Regional Water Quality Control Board (Regional Board) on April 1, 2010, and is subject to requirements in Title 27 of California Code of Regulations (27 CCR) and Title 40 of Federal Code or Regulations (40 CFR), Sections 257 and 248.

27 CCR Section 22220 et seq. requires operators of municipal solid waste landfills to obtain and maintain assurances of financial responsibility for initiating and completing corrective action for known or reasonably foreseeable releases of pollutants from their landfills. 27 CCR Section 22221(b) requires that, effect July 1, 2011, all landfill operators shall demonstrate financial responsibility to the California Department of Resource Recycling and Recovery (CalRecycle) for the greater of either water release corrective action estimate (27 CCR Section 22101(a)) or non-water release corrective action estimate (27 CCR Section 22101(b)). The water release corrective action estimates must be approved by the Regional Board.

Our records indicate that the operator of the Landfill has not provided the Regional Board with a corrective action cost estimate for all known or reasonable foreseeable releases to water as required by 27 CCR. You are hereby directed to submit to the Regional Board, by **August 5, 2013**, a corrective action financial assurance cost estimate, including a detailed cost-estimate breakdown to address a situation in which remediation work of all known or reasonably foreseeable release the Landfill is done by a contracted third party. Once the corrective action cost estimate is reviewed and approved by Regional Board staff, CalRecycle staff will work with you to obtain acceptable financial assurance demonstrations. Failure to provide the required information on a timely manner can result in enforcement actions from the Regional Board.

If you have any questions, please contact Dr. Wen Yang, Chief of the Land Disposal Unit, at (213) 620-2253.

Sincerely,



Samuel Unger, P.E.
Executive Officer