

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

**RESPONSE TO COMMENTS FOR
TENTATIVE ORDER NO. R9-2026-0003
WASTE DISCHARGE REQUIREMENTS FOR
CLOSURE AND POST-CLOSURE MAINTANENCE AND MONITORING
FOR RAMONA LANDFILL INC., A SUBSIDIARY OF REPUBLIC SERVICES
RAMONA LANDFILL, SAN DIEGO COUNTY, CALIFORNIA**

California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) staff prepared responses to comments received on Tentative Order No. R9-2026-0003, *Waste Discharge Requirements for Closure and Post-Closure Maintenance and Monitoring for Ramona Landfill Inc., a Subsidiary of Republic Services Inc., Ramona Landfill, San Diego County* (Tentative Order).

San Diego Water Board staff provided the Tentative Order to all known interested parties on January 15, 2026, and received one comment letter during the 30-day public comment period from Ramona Landfill Inc., a subsidiary of Republic Services (Discharger). The comment period ended on February 16, 2025. The Discharger’s comments below are copied verbatim and San Diego Water Board staff’s responses to the Discharger’s comments indicate whether the Tentative Order was revised (see Table 1). Additionally, Table 2, presents additional changes to the Tentative Order identified by San Diego Water Board staff during the review of the Discharger’s comments. These non-substantive changes are made to improve the readability of the Tentative Order.

Table 1: Discharger’s Comments

No.	Discharger Comments	San Diego Water Board Responses	Actions Taken
1.	<p>Requested text edits to WDR R9-2026-0003 Part (B) Prohibitions; Subpart (1), Section (g).</p> <p><u>Requested Edits:</u> "B. PROHIBITIONS 1. The Discharger must prohibit the following discharges to, or from the Landfill: g. Contaminated soils stockpiled for use in final cover maintenance.</p>	<p>San Diego Water Board staff (staff) agree with the Discharger’s request and have revised the Tentative Order, as shown in the “Actions Taken” column (right). To clarify the intent of prohibition B.1.g, staff provide that the Ramona Landfill (Landfill) is a closed facility, which precludes the Discharger from accepting wastes (e.g., contaminated soils) at the facility property. The Tentative Order prescribes requirements specific to the activities associated with the closure and post-closure maintenance of the Landfill. The Tentative Order does not include requirements necessary to regulate new discharges of waste. Prohibition B.1.g is intended to: 1) clarify that new discharges of contaminated soils, regardless of the proposed use, are prohibited at the Landfill property, and 2) ensure a new discharge of waste at the Landfill does not occur, and does not trigger the need for operational waste discharge requirements (WDRs) at the Landfill, consistent with California Code of Regulations title 27, division 2 (CCR title 27).</p>	<p>Staff revised Tentative Order <i>Prohibitions B.1.g</i> as follows: <i>g. Contaminated soils. stockpiled for use in final cover maintenance.</i></p>

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2.	<p>Requested text edits to WDR R9-2026-0003 Part (C) Landfill Closure Specifications; Subpart (1) General Closure Specifications; Section (b) Final Cover Materials which currently reads as follows: “C. LANDFILL CLOSURE SPECIFICATIONS <i>1. General Closure Specifications</i> <i>b. Final Cover System Materials. Construct the final cover system using soils that have appropriate chemical and physical properties in accordance with CCR title 27, section 20320(a). Specifically, the final cover system soil materials must:</i> <i>i. Have a maximum hydraulic conductivity of 4.0×10^{-4} and an average hydraulic conductivity of 1.6×10^{-7} centimeters per second (cm/sec) or less as determined through field and laboratory testing.</i> <i>ii. Be compacted to 90 percent of the maximum dry density.</i> <i>iii. Have a maximum particle size of less than three inches in diameter or length.</i> <i>(1) Materials whose Grain-Size Distribution tests (American Society for Testing and Materials [ASTM] D422) indicate that the final cover soils contain particles in excess of three inches and/or have a minimum fines content (defined by No. 200 sieve) less than 37 percent for any individual test and an arithmetic mean for ten consecutive tests of less than 42 percent, must be rejected for use in the final cover system.</i> <i>(2) Final cover soils must have a minimum of 20 percent finer than five microns for an individual test and 25 percent for the mean of ten consecutive tests.”</i></p> <p><u>Requested Edits:</u> 1. Subsection “b” of WDRs cites CCR Title 27, section 20320(a), but this Article has to do with containment cells not final closure. The correct Article in CCR Title 27 for Final Closure for Class III Landfills pertains to Section 21090. Reference should be changed to Section 21090. Subsection (i) should be moved to the end of Part (C), Subpart (2), Section (e),</p>	<p>Staff disagree with the proposed revisions to the Tentative Order.</p> <p>This section describes the minimum closure criteria for all landfills subject to CCR title 27. This section is not intended to provide a detailed site-specific description of the design or materials used during closure of the Ramona Landfill (Landfill). The language in this section is consistent other orders issued by the San Diego Water Board for closed landfills in the San Diego region. Specific requirements for the final cover at the Ramona landfill are found in section C.2 of the Tentative Order.</p>	<p>No revisions are made to the Tentative Order in response to this comment.</p>

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	<p>Subsection (i) to read as follows: <u>The final cover system has a total thickness of four feet. The permeability ranges from 1.9 x 10-6 to 1.9 x 10-8 centimeters per second (cm/sec), an average hydraulic conductivity of 1.6 x 10-7 cm/sec and a maximum hydraulic conductivity of 4.0 x 10-4 cm/sec.</u> This would then match the language that is described in Attachment C Paragraph 2. Part (C), Subpart (2), Section (e), Subsections (ii) and (iii) should be removed as all references should only be made to Article 21090.</p>		
3.	<p>Requested text edits to WDR R9-2026-0003 Part (C) Landfill Closure Specifications, Subpart (2) Specific Closure Specifications, Section (e) Final Cover System, Subsection (i) Engineered Alternative Design; Paragraphs (1) and (2) which currently reads as follows: <i>“C. LANDFILL CLOSURE SPECIFICATIONS</i> <i>1. Specific Closure Specifications</i> <i>e. Final Cover System. Construct a final cover system that is consistent with the approved Closure Plan and performance standards outlined in CCR title 27, section 20950(a)(2). The Discharger’s final cover system must consist of the following elements.</i> <i>i. Engineered Alternative Design. The Discharger’s final cover system for the Landfill is an engineered alternative to the prescriptive standard specified in CCR title 27, section 21090(a), which consists of a:</i> <i>(1) Three-foot thick monolithic cover comprised of approximately 226,000 cubic yards of off-site borrow materials were used to meet the design specifications found in the Closure Plan. The monolithic cover is placed above the existing one foot intermediate cover on the upper deck and side slopes.</i> <i>(2) One-foot thick vegetative mulch layer, placed above the monolithic cover.”</i></p>	<p>Staff partially agree with the comment as described below, and have revised the Tentative Order as shown in the Actions Taken column (right).</p> <ul style="list-style-type: none"> • Staff agree with the comment to strike “approximately 226,000 cubic yards of” from the Landfill Closure Specifications section C.1.e.i.(1). Staff revisited the Discharger’s approved Closure Plan and confirmed that the soil volume was not specified. • Staff disagree with the comment to strike “were” from the Landfill Closure Specifications section C.1.e.i.(1). The Discharger’s rationale for removing “were” from the section is unclear to staff. • Staff agree to revise Landfill Closure Specifications section C.1.e.i.(2) to specify “Native hydroseed plant mix” but disagree with the request to include the San Diego Solid Waste Local Enforcement Agency’s permit citation. The issuance of this Tentative Order is independent of any approvals or permits issued by another regulatory agency. The proposal to use native hydroseed plant mix was included in the Final Closure/Post-Closure Maintenance Plan, Ramona Landfill, April 2023; amended June 2024. and therefore, reliance on approval from another agency is not necessary. 	<p>Staff revised Tentative Order <i>Landfill Closure Specifications C.2.e.i.1 and 2</i> as follows:</p> <p>i. Engineered Alternative Design. The Discharger’s final cover system for the Landfill is an engineered alternative to the prescriptive standard specified in CCR title 27, section 21090(a), which consists of a</p> <p>(1) Three-foot thick monolithic cover comprised of approximately 226,000 cubic yards of off-site borrow materials were used to meet the design specifications found in the Closure Plan. The monolithic cover is placed above the existing one foot intermediate cover on the upper deck and side slopes.</p> <p>(2) One-foot thick vegetative mulch layer, placed above the monolithic cover. Native hydroseed plant mix.</p>

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	<p><u>Requested Edits:</u> (1) Three-foot thick monolithic cover comprised of approximately 226,000 cubic yards of off-site borrow materials were used to meet the design specifications found in the Closure Plan. The monolithic cover is placed above the existing one-foot intermediate cover on the upper deck and side slopes. (2) One-foot thick vegetative mulch layer, placed above the monolithic cover. <u>Hydroseeded with a native plant seed mix per the approved Final Closure/Post Closure Maintenance Plan for Romona [sic] Landfill (SWIS No. 37-AA-005; Dated September 2022).</u></p>		
4.	<p>Requested text edits to WDR R9-2026-0003 Part (C) Landfill Closure Specifications, Subpart (2) Specific Closure Specifications, Section (e) Final Cover System, Subsection (ii) Vegetative Mulch Layer.</p> <p><u>Requested Edits:</u> ii. Vegetative Mulch <u>Hydroseed</u> Layer. The Discharger must use a native seed mix of shrubs and grasses applied to the upper deck and side slopes to provide protection against soil erosion upon completion of construction of the final cover system. Only the side slopes may be irrigated, temporarily, to establish the vegetative mulch layer if needed. The vegetative mulch <u>hydroseed</u> layer must be established on the side slopes in approximately three to five years. The Discharger must provide the San Diego Water Board with a contingency plan for providing side slope protection against erosion should the vegetative mulch <u>hydroseed</u> layer fails to become established with five years of the initial application of the seed mix and planting of vegetation because California is facing long-term drought conditions. This contingency plan must be submitted to the San Diego Water Board within 180 days of completion of construction of the landfill final cover system <u>after the</u></p>	<p>Staff partially agree with the comment as described below, and have revised the Tentative Order as shown in the Actions Taken column (right).</p> <ul style="list-style-type: none"> • Staff agree with the comment to replace the term “mulch” with “hydroseed” in this section to be consistent with the changes made in response to comment 3 of this document. • Staff agree with the comment to strike “and planting of vegetation” from this section to be consistent with the Discharger’s approved Closure Plan. • Staff disagree with the Discharger’s proposed revisions to submit the contingency plan 180 days after the five-year vegetation establishment period. The purpose of a vegetative layer is to prevent erosion of the cover soils and potential exposure of waste. Staff recognize that: <ul style="list-style-type: none"> ○ The native hydroseed mix is designed to be drought resistant. ○ After the native hydroseed mix has successfully germinated and established mature drought-resistant plants, the water supply demands of those 	<p>Staff revised the Landfill Closure Specifications, section C.2.e.ii of the Tentative Order as follows:</p> <p>ii. <u>Vegetative Mulch-Hydroseed Layer.</u> The Discharger must use a native <u>hydroseed</u> mix of shrubs and grasses applied to the upper deck and side slopes to provide protection against soil erosion upon completion of construction of the final cover system. Only the side slopes may be irrigated, temporarily, to establish the vegetative mulch <u>hydroseed</u> layer, if needed. The vegetative mulch <u>hydroseed</u> layer must be established on the side slopes in approximately three to five years. The Discharger must provide the San Diego Water Board with a contingency plan for providing side slope protection against erosion should the vegetative mulch layer fail to become established within five years of the initial application of the <u>hydroseed</u> mix and planting of vegetation because California is facing long-term drought conditions. This contingency plan must be submitted to the San Diego Water Board within 180 days of completion of construction of the landfill final cover system.</p>

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	<p><u>completion of the 5-year established period has ended if vegetation has not establish.</u></p>	<p>plants will be supported by ambient atmospheric conditions within the region.</p> <ul style="list-style-type: none"> ○ Establishing a healthy and robust vegetative hydroseed layer is vital to stabilizing and protecting the underlying monolithic cover soils from precipitation events, which are anticipated to become more intense as a result of climate change. ○ Submitting the contingency plan within 180 days of completion of the final cover system provides the Discharger with other “backup” options for establishing the vegetative hydroseed cover, in the event the applied native hydroseed mix cannot be established prior to the rainy season. ○ This requirement is consistent with similar requirements prescribed in other landfill closure and post-closure maintenance orders adopted by the San Diego Water Board. 	
5.	<p>Requested text edits to WDR R9-2026-0003 Part (D) <i>Post-Closure Maintenance Specifications</i>, Subpart (9) Irrigation System.</p> <p>As stated, the previous comment, the Discharger has planned for vegetation for use in California as the area can face long term drought conditions, thus the hydroseed mix is a native seed mix that can thrive in the area with limited watering. The hydroseed mix will be applied during winter months to help with the germination/establishment of the planting material. There currently is no high output water source on site to achieve the requested supplied pressure described.</p> <p><u>Requested Edits:</u></p> <p>9. Irrigation System. The Discharger must <u>shall</u> install an irrigation system <u>only in the event that the proposed seed mixture fails to establish after the 5-year establishment period, and only if an approved source of water is found and is outlined as a viable option in the contingency plan.</u> to</p>	<p>See San Diego Water Board staff response to comment 4.</p>	<p>No revisions are made to the Tentative Order in response to this comment.</p>

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	<p>establish an effective vegetative cover to promote soil stability and limit erosion of the Landfill cover. The irrigation system is expected to run regularly while establishing the vegetative cover, and intermittently afterwards, as needed, to maintain vegetation on the Landfill cover. The irrigation system must be managed by a weather-based irrigation controller and must be operated based on plant needs. When operational, the duration of watering must not exceed the infiltration rate of the cover soil and cause erosion or soil loss. The irrigation system must include the following minimum elements:</p> <p>a. A tandem master valve and flow sensor, installed at the point of connection.</p> <p>b. A mainline (supply line) providing a minimum of 30 pounds per square inch pressure throughout the system and composed of UVR-PVC pipe.</p> <p>c. Remote control valves and secondary laterals with sprinklers on risers located across the side slopes.</p> <p>d. The design for irrigation lines overlying waste must also include flexible connectors, secondary containment, rain sensors, and automatic shut-off valves. When not in operation, the pipes of the irrigation system must not be charged with water. The Discharger must develop and submit to the San Diego Water Board a maintenance plan describing an inspection and maintenance schedule for the irrigation system. A copy of the maintenance plan and inspection schedule must be submitted as an appendix to the Annual Site Conditions Certification Report (see Reporting Requirement G.5).</p> <p>e. Once the irrigation is no longer needed, the watering system must be removed or maintained in good condition if left in place.”</p>		
6.	Requested text edits to WDR R9-2026-0003 Part (D) Post-Closure Maintenance Specifications, Subpart (10) Stormwater Management:	Staff disagree with the proposed revisions to the Tentative Order, as described below.	No revisions are made to the Tentative Order in response to this comment.

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	<p><u>Requested Edits:</u> Text adjustments to the end of Subpart (10) and Section (j) as listed below: ...Based on the results of the re-evaluation, the design and construction of stormwater conveyance and <u>conveyance systems within</u> containment structures must be adjusted to accommodate higher volumes of stormwater run-on and run-off. The Discharger must implement the following minimal measures to manage stormwater run-on and run-off at the Landfill: j. Stormwater flows that accumulate in the Landfill's southeast and southwest stormwater detention basins may have overflow discharges to Pamo Creek, per the approved closure plan. Both stormwater detention basins are dewatered after rain events via skimmers that remove surface water to allow for the settlement of sediment and limit sediment discharges to Pamo Creek during storm events.</p>	<p>The proposed revisions to the text are not substantive and do not change the context or meaning of the existing closure specifications. Additionally, the proposed revision to the text adds ambiguity and confusion regarding which components may need to be adjusted to accommodate higher volumes of stormwater run-on and run-off. Therefore, no revisions are needed to clarify this section of the Tentative Order.</p> <p>The text regarding the use of skimmers in stormwater detention basins was derived from the approved Final Closure/Post-Closure Maintenance Plan, Section 4.0, Final Closure Plan, page 4-6. Therefore, the directive is consistent with the stormwater management protocols established by the Discharger and does not warrant a change to the Tentative Order.</p>	
7.	<p>Requested text edits to WDR R9-2026-0003 Part (D) Post-Closure Maintenance Specifications, Subpart (12) Detention and Desiltation Basins. The site is closed/near closure approval, and thus can be taken out of NPDES compliance for stormwater requirements. The current basins were part of operational procedures during landfilling and would continue to be utilized for post-closure use</p> <p><u>Requested Edits:</u> 12. Detention and Desiltation Basins. Apply the following minimum criteria to all basins constructed to manage stormwater run-on and run-off at the Landfill. a. Detention basins used to contain stormwater run-off must be designed and constructed in accordance with the findings and design criteria provided in the Closure Plan</p>	<p>Staff disagree with the proposed revisions to the Tentative Order, as described below.</p> <p>Staff understand that the current basins will continue to be used during the post-closure period. Section D.12 of the Tentative Order provides requirements for the basins that will be used during the post-closure period and for any new basins that may be constructed. The criteria for sizing stormwater management systems and storm events are derived from CCR title 27, sections 20310, 20365, and Table 4.1, not the federal requirements found in National Pollutant Discharge Elimination System (NPDES) permits. CCR title 27 requires Dischargers to design and construct precipitation and drainage control facilities that can manage peak flows from a 100-year, 24-hour storm event. Therefore, the requirements included in the Tentative Order are appropriate and necessary to ensure compliance with the applicable regulations. In addition, there have been higher</p>	No revisions are made to the Tentative Order in response to this comment.

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	<p>and any hydrology studies contained there, or in an update to the Closure Plan as approved by the San Diego Water Board. At a minimum, basins must be designed to contain <u>peak convey</u> stormwater flows associated with a 100-year, 24-hour storm event, as defined by the most recent evaluation of the recurrence interval and severity of a 100-year, 24-hour storm event.</p> <p>b. Detention and desiltation basins must be designed and sited to minimize impacts and risks to waste containment structures at the Landfill. Basins must be concrete lined and not located up-slope or immediately adjacent to other <u>on</u> waste containment structures, because basin failure in these locations may damage the containment system and/or allow stormwater to infiltrate the waste prism.</p>	<p>volume storm events in California as a result of climate change; therefore, Dischargers are required to mitigate for potential impacts from these events. The Discharger may submit a work plan to expand or reconstruct the existing detention basins if it is determined that the current sizing does not meet these requirements. The requirement in the Tentative Order is consistent with requirements previously adopted by the San Diego Water Board in other WDRs issued for closure and post-closure maintenance.</p> <p>Conversely, the Discharger can submit a revised post-closure maintenance plan that details the mitigating steps that will be taken after storm events to ensure the existing detention basins have enough freeboard to manage and contain peak flows from a 100-year, 24-hour storm event.</p>	
8.	<p>Requested text edits to WDR R9-2026-0003 Part (E) Inspections, Subpart (2) Post-Rain Inspection Report. Match other Regional Water Board General Order Requirements for precipitation events that state 1-inch over a 24 hour period only. All tracking is currently performed in a 24-hour period not in 72-hour periods.</p> <p>Requested Edits: “E. INSPECTIONS 2. Post-Rain Inspection Report. The Discharger must perform an inspection of the Landfill within 24 hours of a precipitation event that has a cumulative rainfall of one inch (<u>1”</u>) or greater over a 72 <u>24</u>-hour period (<u>midnight to midnight</u>, Storm Event) at the Landfill, as conditions allow. The Post-Rain Inspection Report must be submitted to the San Diego Water Board within 48 hours of inspection completion. If the deadline for submitting a Post-Rain Inspection Report coincides with a holiday or non-operational day for the Discharger, the inspection report may be submitted by noon of the next business day.</p>	<p>Staff partially agree with the comment as described below, and have revised the Tentative Order as shown in the Actions Taken column (right).</p> <ul style="list-style-type: none"> • Staff agree with the comment to add “(1)” to section E.2 of the Tentative Order. This addition provides clarification to the Tentative Order, thereby supporting the Discharger’s ability to comply with this requirement. • Staff disagree with the comment to replace the “72-hour period” with “24-hour period”, to be consistent with the San Diego Water Board’s Order No. R9-2012-0001, <i>General Waste Discharge Requirements for the Maintenance and Monitoring of Closed, Abandoned, or Inactive Nonhazardous Solid Waste Units within the San Diego Region</i> (General Order). Staff anticipate making numerous revisions to the General Order requirements including the duration of precipitation events that trigger dischargers to inspect a landfill. Staff’s experience implementing the General Order requirements found that the region is experiencing smaller rain events, reoccurring over multiple consecutive days, which may be associated with climate change. These observed shifts in climatic 	<p>Staff revised the Inspections section E.2 of the Tentative Order as follows:</p> <p>2. Post-Rain Inspection Report. The Discharger must perform an inspection of the Landfill within 24 hours of a precipitation event that has a cumulative rainfall of one inch (<u>1”</u>) or greater over a 72-hour period (Storm Event) at the Landfill, as conditions allow.</p>

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		<p>conditions may indicate that future storm events may not meet the current 24-hour 100-year storm event threshold requirement, but the cumulative impact to the landfills, over a greater time period, may be the same or greater. Therefore, Staff are requiring the Discharger to inspect the site for cumulative impacts from consecutive, smaller storm events occurring over a 72-hour period to ensure the final cover and monitoring systems have not sustained damage and are functioning properly.</p> <ul style="list-style-type: none"> Staff disagree with the comment to add “midnight to midnight” to section E.2 of the Tentative Order. In the absence of the Discharger’s rationale to support the change, staff remain concerned that arbitrarily fixing the 24-hour window from midnight to midnight, may artificially bypass the intent of this requirement and create an unmitigated risk to the Landfill. 	
9.	<p>Requested removal of to <i>[sic]</i> WDR R9-2026-0003 Attachment A, Part II.F. – Surface Water Monitoring There are no surface water bodies at the site.</p>	<p>Staff disagree with the request to remove the requirements for surface water monitoring found in Attachment A, Part II.F of the Tentative Order.</p> <p>According to Comment 6 above, overflow from the existing detention basin flows into Pamo Creek, indicates there is a surface water body within or adjacent to the property boundary. Therefore, the Discharger is required to implement the surface water monitoring requirements in CCR title 27, section 20415(c). Staff anticipate that the Discharger will propose surface water monitoring locations, and sampling protocols as part of the Sampling and Analysis Plan required under Attachment A, Part II.F.</p>	<p>No revisions are made to the Tentative Order in response to this comment.</p>
10.	<p>Requested removal of second paragraph in to <i>[sic]</i> WDR R9-2026-0003 Attachment A, Part II.H – Five Year COC Scan. There are no surface water bodies at the site.</p>	<p>Staff disagree with the request to remove the requirements for the surface water 5-year COC scan found in Attachment A, Part II.H of the Tentative Order.</p> <p>See response to Comment 9 above.</p>	<p>No revisions are made to the Tentative Order in response to this comment.</p>

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11.	<p>Requested edits in third paragraph of to [sic] WDR R9-2026-0003 Attachment A, Part II.H– Five Year COC Scan to read as follows:</p> <p>The five-yearly COC sampling and analysis must occur at alternating intervals to account for seasonal variations in the hydrogeology at the landfill. The Discharger must alternate sampling and analysis between winter-spring and summer-fall timeframes. The Discharger must report the analytical results of the sampling event as an attachment to the Annual Summary Report, due April 30 of the same year. Semiannual report associated with the monitoring period in which the five-year COC monitoring [sic] was conducted (e.g. winter/spring COC sampling results reported April 30, summer/fall COC sampling results reported October 30).</p> <p>Note, if needed, the five-year COC report can also be included as an attachment to the Annual Summary Report.</p>	<p>Staff disagree with both proposed revisions to the Tentative Order, as explained below.</p> <p>The proposal to change “yearly” to “year” is incorrect. Staff’s use of “yearly” is intended to identify that constituent of concern (COC) scans are reoccurring events with a frequency of once every five years. The use of “year” is used when referring to a singular COC scan event.</p> <p>The Annual Summary Report is intended, in-part, to provide Staff with a holistic summary and evaluation of all activities completed and data collected during the previous year, as part of the Landfill’s approved groundwater, surface water, and landfill gas monitoring programs. The inclusion of the 5-Yearly Constituent of Concern (COC) Scan data in the Annual Summary Reports and not the semi-annual reports is intended to support the Discharger’s holistic review of the Landfill’s monitoring programs to determine if a monitoring program requires modification (i.e., adding new emerging COCs) or if corrective actions need to be proposed to address areas of noncompliance.</p> <p>The approach to include the 5-Yearly COC Scan data in Annual Summary Reports is consistent with other landfill orders adopted by the San Diego Water Board. Additionally, staff have found this approach provides Dischargers with more time to evaluate the data and develop reasonable response actions for staff consideration.</p>	<p>No revisions are made to the Tentative Order in response to this comment.</p>
12.	<p>Requested edit to submittal date for to WDR R9-2026-0003 Attachment A, Part IV.C.2 – Five Year COC report.</p> <p>In keeping with the requirement to perform Five-year COC monitoring events at alternating intervals to account for</p>	<p>Staff disagree with the proposed revisions to 1) eliminate surface water monitoring and 2) submit the 5-Yearly COC sampling results as part of the Discharger’s semi-annual report. See responses to Comment 9 and 11 above.</p>	<p>No revisions are made to the Tentative Order in response to this comment.</p>

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	<p>seasonal variations in the hydrogeology of the site (attachment A, Part II.H), the next five-year COC monitoring event is scheduled for June 2026 (previous five-year COC monitoring event conducted in December 2021). The results will be included in the October 2026 report.</p> <p><u>Requested Edit:</u> Five-year COC reports: The discharger must complete a COC analysis on groundwater and surface water samples to update and verify the COC list included in the Semi-Annual Groundwater Monitoring Report every five years. The COC analysis must include all COCs found in Appendix II. The next COC Report must be received no later than 5:00 PM, on April 30 <u>October 30</u>, 2026. Subsequent COC reports must be submitted every fifth year, as an attachment to the Annual Summary Report. <u>in the semi-annual report associated with the monitoring period in which the five-year COC monitoring was conducted (e.g. winter/spring COC sampling results reported in April, summer/fall COC sampling results reported October 30).</u></p> <p>Note, if needed, the five-year COC report can also be included as an attachment to the Annual Summary Report.</p>		
13.	<p>Requested edit to table and notes below table in to <i>[sic]</i> WDR R9-2026-0003 Attachment A, Part IV.D – Reporting Schedule</p> <p>1. Requested that Groundwater COC Report Due date align with the semi-annual reporting period in which the samples were collected as noted in two previous requested edits (October 30th).</p> <p>2. Requested that Surface Water COC Report be removed from the table since there is no surface water at the facility.</p> <p>3. Requested that Note “C” beneath the table be edited to note October 30, 2026 due date for next Groundwater COC report.</p>	<p>Staff partially agree with the Discharger’s requested changes.</p> <p>Staff disagree with request 1. See response to comment 11, above.</p> <p>Staff disagree with request 2. See response to comment 9, above.</p> <p>Staff agree with request 3 and have revised footnote C as shown to the right.</p> <p>Staff disagree with request 4. See response to comment 9 above.</p>	<p>Staff revised the Tentative Order Attachment A, Part IV.D <i>Reporting Schedule, footnote C</i> as follows:</p> <p>^c The Discharger’s next five-year Groundwater COC Report is due April 30, 2026 <u>2027</u>. COC list data must be collected in alternating seasons to account for seasonal variations. For example, if the previous COC sampling event occurred in the wet season (October 1 – April 30), the next COC sampling event should occur in the dry season (June 1 – September 30).</p>

No.	Discharger Comments	San Diego Water Board Responses	Actions Taken																				
	4. Requested that Note "D" beneath the table be removed since there is no surface water at the facility.																						
14.	<p>Requested text edits to WDR R9-2026-0003 Attachment C Requirements for Final Cover and Fill Soil; Part (B) Sampling and Analysis Plan; Subpart (4) Sampling Frequency Table Text correction for missing category.</p> <p>Requested Edits:</p> <table border="1" data-bbox="282 753 1028 999"> <thead> <tr> <th>Volume of Soil</th> <th>Required Number of Samples</th> </tr> </thead> <tbody> <tr> <td><100 cy</td> <td>4 samples</td> </tr> <tr> <td>100 cy <500 cy</td> <td>4 samples, plus 1 sample for every additional 25 cy over 100 cy</td> </tr> <tr> <td>500 cy <5,000 cy</td> <td>20 samples, plus 1 sample for every additional 500 cy</td> </tr> <tr> <td>5,000 cy or more</td> <td>29 samples, plus 1 sample for every additional 1,000 cy over 5,000 cy</td> </tr> </tbody> </table>	Volume of Soil	Required Number of Samples	<100 cy	4 samples	100 cy <500 cy	4 samples, plus 1 sample for every additional 25 cy over 100 cy	500 cy <5,000 cy	20 samples, plus 1 sample for every additional 500 cy	5,000 cy or more	29 samples, plus 1 sample for every additional 1,000 cy over 5,000 cy	Staff agree with the Discharger's request and revised the Tentative Order as shown to the right.	<p>Staff revised the Tentative Order Attachment C, <i>Requirements for Final Cover and Fill Soil B.4</i> as follows:</p> <p>B.4: Sampling Frequency. The Discharger must provide a sampling frequency at the appropriate rate indicated by the table below:</p> <table border="1" data-bbox="2094 727 2924 1074"> <thead> <tr> <th>Volume of Soil</th> <th>Required Number of Samples</th> </tr> </thead> <tbody> <tr> <td><100 cy</td> <td>4 samples</td> </tr> <tr> <td>100cy < 500cy</td> <td>4 samples, plus 1 sample for every additional 25 cy over 100 cy</td> </tr> <tr> <td>500 cy <5,000 cy</td> <td>20 samples, plus 1 sample for every additional 500 cy</td> </tr> <tr> <td>5,000 cy or more</td> <td>29 samples, plus 1 sample for every additional 1,000 cy over 5,000 cy</td> </tr> </tbody> </table>	Volume of Soil	Required Number of Samples	<100 cy	4 samples	100cy < 500cy	4 samples, plus 1 sample for every additional 25 cy over 100 cy	500 cy <5,000 cy	20 samples, plus 1 sample for every additional 500 cy	5,000 cy or more	29 samples, plus 1 sample for every additional 1,000 cy over 5,000 cy
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15.	<p>Requested text removal to WDR R9-2026-0003 Attachment C Requirements for Final Cover and Fill Soil; Part (B) Sampling and Analysis Plan; Subpart (6) Grid Pattern which currently reads as follows: "6. <i>Grid Pattern. The Discharger must include a grid pattern to visually display the proposed soil sampling points.</i>"</p> <p>Requested Edits: Delete Subpart 6 as the sampling cannot be done on a grid and is based on the raise and location of contractor filling.</p>	<p>Staff disagree with the request to delete the requirement for the sampling and analysis of potential borrow soils for future final cover repairs.</p> <p>In accordance with the requirements specified in the Tentative Order, the Discharger is required to maintain the landfill cover, which may require Discharger to import soil for significant cover repairs or maintenance. As such, the Discharger is required to submit a work plan for Staff's consideration, that includes a soil sampling and analysis plan to demonstrate the soils satisfy the conditions for use at the Landfill. The Discharger's sampling and analysis plan must ensure that an appropriate number of samples are collected prior to importing materials onsite, to fully characterize the volume of soil and avoid inadvertently discharging waste to the Landfill cover. To delete subpart 6, as</p>	<p>Staff revised the Tentative Order Attachment C, <i>Requirements for Final Cover and Fill Soil B.6</i> as follows: B.6: Grid Pattern. The Discharger must include a grid pattern to visually display the proposed soil sampling points. <u>or the Discharger may propose an equivalent methodology to demonstrate the quality of import soils.</u></p>																				

No.	Discharger Comments	San Diego Water Board Responses	Actions Taken
		<p>requested, would eliminate necessary safeguards to ensure environmental protection and regulatory compliance, and therefore is inappropriate. Alternatively, Staff have amended the Tentative Order to allow the Discharger to propose, in the work plan, a different but equivalent methodology to demonstrate the quality of the import soils.</p>	
16.	<p>Requested text removal or edits to WDR R9-2026-0003 Attachment C Requirements for Final Cover and Fill Soil; Part (C) Sampling and Analysis Final Report. Closure Soil has been installed, this report has already been submitted. Request for this section to be removed. Or at a minimum edited as shown below:</p> <p><u>Complete Removal or Requested Edits:</u> “C. Sampling and Analysis Final Report <u>for repair soils</u>. The Discharger must submit a Sampling and Analysis Final Report summarizing the soil characterization sampling activities and provides the analytical results for San Diego Water Board staff consideration. The Sampling and Analysis Final Report must include the following minimum information:</p> <ul style="list-style-type: none"> • Map of the soil source site with sample area grid pattern that has been <u>locations to include any re-sampling or additional samples collected.</u> • Updated to include any re-sampling or additional samples collected. • Copy of analytical data from a laboratory with Environmental Lab. • Accreditation Program (ELAP) accreditation. <i>[sic]</i> • Demonstration of hydraulic conductivity compliance. • Description of soil segregation and disposal activities for any samples containing waste. • Copy of waste manifests, if applicable. • Updated volume of soil proposed to be imported to the site. 	<p>Staff disagree with the Discharger’s request to remove or edit the text in section C, for the following reasons:</p> <ul style="list-style-type: none"> • Adding “for repair soils” to the section title. This language is duplicative of the other sections in Attachment C; therefore, it is unnecessary. • Removing “area grid pattern that has been” and replacing it with “to include any resampling or additional samples collected.” This requirement of the Sampling and Analysis Final Report is to document the proposed sampling locations of the soil to ensure the soil has been adequately sampling without location bias. • Removing “updated to include any resampling or additional samples collected.” This requirement of the Sampling and Analysis Final Report is to reflect the actual sampling locations to be able to compare with proposed sampling locations in the above bullet point. • Removing “proposed to be” to the updated volume of soil to be imported to the site. 	<p>No revisions were made to the Tentative Order in response to this comment.</p>

No.	Discharger Comments	San Diego Water Board Responses	Actions Taken
	<ul style="list-style-type: none"> • Approximate <u>Documented</u> timeline for importing the soil to the site. • Map where the proposed stockpile will be <u>is</u> located on site, if applicable. 	<p>The Sampling and Analysis Final Report will not be approved at the time of submittal; therefore, the volume of soil is still proposed to be imported.</p> <ul style="list-style-type: none"> • Removing “Approximate’ and replacing it with “Documented.” <p>The Sampling and Analysis Final Report will not be approved at time of submittal; therefore, the timeline of soil importation is approximate at this point in time.</p> <p>For additional clarification, Attachment C is provided for future repairs of the final cover, not for the work already or planned to be completed as part of closure. When the completed final cover requires significant maintenance or repairs, the Discharger must submit a work plan consistent with the requirements in Attachment C, which includes the sampling and analytical criteria for soils proposed for use in final cover repairs.</p>	
17.	<p>Requested replacement of WDR R9-2026-0003 Attachment D Requirements for Annual Site Conditions Certification Reporting.</p> <p><u>Requested Replacement:</u> Attachment D should be replaced with the approved GENERAL ORDER R9-2012-0001 “GENERAL WASTE DISCHARGE REQUIREMENTS FOR THE MAINTENANCE AND MONITORING OF CLOSED, ABANDONED, OR INACTIVE NONHAZARDOUS SOLID WASTE UNITS WITHIN THE SAN DIEGO REGION” to be consistent with all other closed landfill sites in the San Deigo Region as the two General Orders contradict each other with respect to timing and items that are to be included.</p>	<p>Staff disagree with the suggested revision to remove Attachment D and require the Discharger to comply with the annual reporting requirements of General Order No. R9-2012-0001, <i>General Waste Discharge Requirements for the Maintenance and Monitoring of Closed, Abandoned, or Inactive Nonhazardous Solid Waste Units within the San Diego Region</i>.</p> <p>The Ramona Landfill does not meet the requirements of a Closed, Abandoned, or Inactive (CAI) Landfill as defined in CCR title 27, section 20080(d) because it was not closed, abandoned, or inactive on or prior to November 27, 1984, and is therefore not qualified to be regulated under the General Order. San Diego Water Board staff developed the Annual Site Conditions Certification Report requirements included in Attachment D to ensure an accurate reporting of site conditions specific to the Ramona Landfill. In addition, San Diego Water Board staff require the Annual Site Conditions Certification Report to be submitted by October 30th of each year to document the actions</p>	No revisions were made to the Tentative Order in response to this comment.

No.	Discharger Comments	San Diego Water Board Responses	Actions Taken
		taken by the Discharger to prepare the Landfill for the rainy season which begins on October 1 st of each year.	

Table 2: San Diego Water Board Staff's Revisions

No.	San Diego Water Board Additional Revisions	Actions Taken
1.	Staff identified the Tentative Order establishes the effective date on pages 1 and 6 (i.e., Finding A.14). To eliminate the redundancy of information and potential confusion, staff revised the Tentative Order as shown in the "Actions Taken" column to the right. Staff consider this change to be non-substantive, and does not require staff to re-initiate a new 30-day public comment period.	Staff revised the Tentative Order as follows: A FINDINGS 14. Effective Date. This Order becomes effective on the date of adoption by the San Diego Water Board.
2.	Staff identified the Tentative Order includes similar statements on pages 1 and 6, equating the Tentative Order's effective date and the Board's adoption date. To eliminate the redundancy of information, staff revised the Tentative Order as shown in the "Actions Taken" column to the right. Staff consider this change to be non-substantive, and does not require staff to re-initiate a new 30-day public comment period.	Staff revised the Tentative Order as follows: A. FINDINGS IT IS HEREBY ORDERED that this Order is effective upon the date of adoption. To meet the provisions contained in division 7 of the Water Code, commencing with section 13000, and the applicable regulations, it is further ordered that the Discharger comply with following:
3.	Staff identified a grammatical error on page 1 of the Tentative Order and corrected the grammar in the final Tentative Order. Staff consider this change to be non-substantive, and does not require staff to re-initiate a new 30-day public comment period.	Staff revised the Tentative Order as follows: I, David W. Gibson, Executive Officer, do hereby certify that this Order with all attachments is a full, true, and correct copy of <u>the</u> this Order adopted by the San Diego Water Board on <Date of adoption>.