

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

**EXECUTIVE OFFICER SUMMARY REPORT
NOVEMBER 10, 2026**

ITEM 7

SUBJECT

An overview of closure and post-closure maintenance requirements for closed landfills in the San Diego Region. (Josh Hufferd)

STAFF RECOMMENDATION

Information item only. No staff recommendation.

KEY ISSUES

This item provides the San Diego Water Board and the public an opportunity to learn about closed landfills within the San Diego Region. This information item will cover the requirements for the closure and post-closure maintenance of landfills, and how these requirements are different from those for pre-regulatory landfills. Pre-regulatory landfills are those landfills that ceased waste disposal operations and received all necessary permits on or before November 27, 1984. This item will also provide an overview of San Diego Water Board staff's (staff) efforts to update existing orders, which includes General Order Nos. R9-2012-0001,¹ R9-2012-0002,² and R9-2012-0003,³ (collectively, General Orders).

PRACTICAL VISION

The San Diego Water Board's [Practical Vision](#) chapter on *Strategizing for Healthy Waters* emphasizes the importance of the Board's efforts to protect and restore the chemical, biological, and physical integrity of the waters in the San Diego Region. Closed landfills served as the final disposal site for municipal, industrial, and demolition waste, and as such have the potential to pose a significant threat to the environment if not properly maintained and monitored after closure. The San Diego Water Board's Land Disposal Program staff provide guidance and oversight to Dischargers to ensure that the prescriptive and performance standards set forth in the applicable regulations are continuously implemented to protect human health and the environment.

¹ Order No. R9-2012-0001, *General Waste Discharge Requirements for the Maintenances and Monitoring of Closed, Abandoned, or Inactive Nonhazardous Solid Waste Units within the San Diego Region*

² Order No. R9-2012-0002, *Monitoring and Reporting Program No. R9-2012-0002 for the Maintenances and Monitoring of Closed, Abandoned, or Inactive Nonhazardous Solid Waste Units within the San Diego Region.*

³ Order No. R9-2012-0003, *General Waste Discharge Requirements for the Maintenances of Closed, Abandoned, or Inactive Burn Sites within the San Diego Region.*

DISCUSSION

The purpose of this item is to provide the Board, and the public, with information on the post-landfilling waste management activities in the San Diego region, and staff efforts to update the General Orders. This item is the second in a three-part series describing the San Diego Water Board's Land Disposal Program.

In April 2026, staff's presentation to the Board focused on active waste disposal operations in the San Diego Water Board region, highlighting the applicable requirements for the design, construction, maintenance, and monitoring of containment systems, essential for protecting public health and the environment. These requirements generally denote the first two phases of a landfill's figurative lifespan – design/construction and waste disposal (i.e., landfilling). The third phase, closure, will be covered as part of this item's presentation.

Post-Landfilling Waste Management Activities

The San Diego Water Board's Land Disposal Program subdivides the region's 34 post-landfilling waste management sites into three groups:

- Closed Landfills, which ceased waste disposal operations and received all necessary permits after November 27, 1984. Closed landfills are subject to the regulations found in division 2 of the California Code of Regulations title 27 (CCR title 27) and provide prescriptive and performance-based standards for closure, clean closure, and post-closure maintenance and monitoring of landfills. Staff use these standards to establish individual waste discharge requirements (WDRs) for each facility.
- Closed, Abandoned, or Inactive (CAI) Landfills, which ceased waste disposal operations and received all necessary permits on or before November 27, 1984. CAI landfills are designated as "existing" sites under CCR title 27. Existing sites are required to comply with the 1) pre-CCR title 27 closure and maintenance standards, and 2) CCR title 27 monitoring program standards, which are the same for closed landfills. Staff used these standards to establish the requirements specified in Order Nos. R9-2012-0001 and R9-2012-0002. Currently, 13 CAI landfills are enrolled in Order Nos. R9-2012-0001 and R9-2012-0002.
- CAI Burn Sites, which ceased waste incineration activities on or before November 27, 1984. CAI burn sites are designated as "existing" sites under CCR title 27. Existing burn sites are required to comply with pre-CCR title 27 closure and maintenance standards. Staff used these standards to establish the requirements specified in Order No. R9-2012-0003. Currently, three CAI burn sites are enrolled in Order No. R9-2012-0003.

Individual Orders Update

The Land Disposal Program regulates 14 closed landfills and burn sites under individual waste discharge requirements orders. These facilities either closed or received all necessary permits after November 27, 1984, or were closed, abandoned, or inactive before that date but otherwise do not qualify or would not be appropriately regulated under a general order. These include landfills that may have accepted additional waste after formal closure or have significant post-secondary uses that necessitate specific maintenance activities. All but two of the individual orders were adopted by the San Diego Water Board over 20 years ago, with the two exceptions being Order No. R9-2016-0149 for Forster Canyon Landfill and Order No. R9-2026-0003 for Ramona Landfill. The oldest active individual order was adopted in 1987 and the most recently adopted order is from 2026. These individual orders contain outdated regulatory references and requirement language that is often vague and has since been refined both in CCR title 27 and the more recent orders.

Currently staff are in the process of drafting updated WDRs to replace the first of several individual WDRs, starting with older orders from the 1980s and 1990s. These updated WDRs will clarify existing maintenance and reporting requirements. Additionally, the updated WDRs will establish a process for dischargers to identify unexpected stormwater capacity deficiencies due to climate change. Staff anticipate bringing new individual orders to the Board for consideration over the next several years. Additionally, the Land Disposal Program will reevaluate if CAI landfills under individual orders may qualify for enrollment in an updated general order.

General Orders Update

In April 1997, the San Diego Water Board adopted General Order No. 97-11, which established monitoring and maintenance requirements for CAI landfills and burn sites, in accordance with chapter 15 of division 3 of California Code of Regulations title 23. In July 1997, the State Water Resources Control Board (State Water Board) and the California Department of Resources Recycling and Recovery⁴ jointly promulgated consolidated landfill regulations under CCR title 27. While CCR title 27 is largely focused on solid waste facilities that continue to operate or began operations after November 27, 1984, it does contain standards for the maintenance, monitoring, and reporting of conditions at CAI sites. Although General Order No. 97-11 was amended six times since the promulgation of CCR title 27, these amendments did not comprehensively incorporate the CCR title 27 regulations.

In early 2011, Land Disposal Program staff reviewed General Order No. 97-11 and decided to issue new, updated individual general WDRs for CAI landfills and burn sites.

⁴ Formerly the California Integrated Waste Management Board

The California Water Code allows general WDRs to be issued when the discharges: 1) are produced by the same or similar operations, 2) involve the same or similar types of waste, 3) require the same or similar treatment standards, and 4) are more appropriately regulated under general orders than individual orders. CAI landfills and burn sites contain wastes that are produced through different processes, wastes that are different in nature, and wastes that require different treatment standards. For these reasons, staff concluded that separate general orders were appropriate. The San Diego Water Board subsequently adopted the General Orders in June 2012.

Currently staff are in the process of drafting updated WDRs to replace the General Orders. These updated WDRs will further clarify existing maintenance and reporting requirements, based on staff observations implementing the General Orders. Additionally, the updated WDRs will establish a process for dischargers to identify unexpected stormwater capacity deficiencies due to climate change. Staff anticipate holding two discharger workshops in 2027. These workshops will provide an open forum for dischargers to discuss the proposed requirements and specifications, as well as allow dischargers to propose additional updates, based on observations implementing the CAI Orders. Staff anticipate bringing new general orders to the Board for consideration in late 2027 or early 2028.

PUBLIC NOTICE

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

SUPPORTING DOCUMENTS

None.