

State of California
Regional Water Quality Control Board
San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT
April 15, 2015

- ITEM: 6
- SUBJECT: Waste Discharge Requirements Amendment: Modification of Order No. 99-74, Waste Discharge Requirements for the Sycamore Landfill Inc., A Subsidiary of Republic Services Inc., Sycamore Landfill, San Diego County (Tentative Addendum No. 3 to Order 99-74). (Amy Grove)
- PURPOSE: To consider adopting Tentative Addendum No. 3 to Order No. 99-74 (Supporting Document No. 1)
- RECOMMENDATION: Adoption of Tentative Addendum No. 3 to Order No. 99-74 is recommended.
- KEY ISSUES:
1. Tentative Addendum No. 3 to Order No. 99-74 incorporates into the waste discharge requirements (WDRs) for the Sycamore Landfill an engineered alternative liner design for the Stage III-C, III-D1, III-D2, and IV lateral expansion units at the landfill.
 2. Tentative Addendum No. 3 to Order No. 99-74 allows the Discharger to construct additional waste units and to continue its solid waste disposal operations at the Sycamore Landfill.
- PRACTICAL VISION: Tentative Addendum No. 3 to Order No. 99-74 ("the tentative Addendum") implements the goal of the Practical Vision to maintain healthy waters in the San Diego Region. By requiring proper management, disposal, and long-term containment of solid wastes in the landfill, the WDRs for the landfill ensure protection of groundwater and surface water quality.
- DISCUSSION: The tentative Addendum is necessary for the Sycamore Landfill operator, Sycamore Landfill Inc. (the Discharger) to expand the landfill footprint, and continue solid waste disposal operations at the Sycamore Landfill. The tentative Addendum prescribes waste discharge requirements for construction of the Stage III-C, III-D1, III-D2, and IV lateral

expansion units using the engineered alternative composite liner design previously approved for units III-A and III-B in Addendum No. 2. Construction of these four expansion units will increase the landfill's overall capacity by approximately 2.6 million cubic yards.

Although the San Diego Water Board has yet to adopt the tentative Addendum, the Discharger decided to construct the Stage III-C unit upon preliminary approval of the liner design by staff. Construction of the unit was completed in December 2014. The Discharger took this step to stay on track with its construction schedule to complete the various expansion units planned for the landfill. As long as the Discharger does not place waste in the unit prior to the Board adopting tentative Addendum No. 3 and San Diego Water Board staff approve a final construction inspection; the Discharger remains in compliance with the Water Code, State regulations, and applicable Basin Plan waste discharge prohibitions. If the liner design is changed as a result of the Board's adoption process, the Discharger will need to modify the Stage III-C unit to conform to the design ultimately incorporated into the WDRs for the landfill.

Staff performed an inspection of the newly constructed unit, on March 13, 2015, as required by the California Code of Regulations (CCR) Title 27.¹ During that inspection, the San Diego Water Board staff identified a number of areas of concern. Staff and the Discharger are working together to resolve the areas of concern. The ongoing final inspection/approval process for the new Stage III-C unit should not hinder or delay the San Diego Water Board's consideration and approval of Tentative Addendum No. 3 to Order No. 99-74.

The Discharger submitted a Design Report for the Stage III-D1, D2, and IV expansion units in November 2014 and staff deemed it complete in January 2015. Waste discharge requirements for these units are included in tentative Addendum No. 3 but construction has not yet started on the Stage III-D1, III-D2, and IV expansion units.

The San Diego Water Board received no public comments on the tentative Addendum.

¹ CCR Title 27, section 20310(e): Units shall receive a final inspection and approval of the construction by RWQCB or SWRCB staff before use of the Unit commences.

LEGAL CONCERNS: None

SUPPORTING DOCUMENTS:

1. Tentative Addendum No. 3 to Order No. 99-74
2. Map Showing the Stage III-C, III-D1, III-D2, and IV Expansion Areas
3. Notification Letters

SIGNIFICANT CHANGES

1. The tentative Addendum modifies the composite liner design to include two high density polyethylene (HDPE) flexible membrane liner components and a geotextile on side slopes located above wide benches used as maintenance roads.

2. The tentative Addendum prescribes waste discharge requirements for four expansion units that will add the following additional solid waste disposal capacity at the Sycamore Landfill:

- Stage III-C: 700,000 cubic yards;
- Stage III-DI: 70,000 cubic yards;
- Stage III-DII: 300,000 cubic yards;
- Stage IV: 900,000 cubic yards.

COMPLIANCE RECORD: The County of San Diego Department of Public Works, the former owner and operator of Sycamore Landfill, completed a State mandated Solid Waste Assessment Test (SWAT) investigation in 1992. The results indicated that volatile organic compounds (VOCs) had been released from the unlined portion of the Sycamore Landfill.

The Discharger is addressing the release and related impacts to groundwater by implementing a corrective action program. The program includes pumping and treating contaminated groundwater at the site, and groundwater-monitoring.

PUBLIC NOTICE: Notification of this action was sent to known interested parties on January 30, 2015 (Supporting Document No. 4). The Tentative Addendum was also posted on the San Diego Water Board website January 30, 2015. These actions satisfy the public notification requirements of Water Code, division 7, section 13167.5 and CCR Title 27, section 21730(b) for a 30-day notice.