CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

TENTATIVE ADDENDUM NO. 1 TO ORDER NO. 99-74

AMENDING WASTE DISCHARGE REQUIREMENTS FOR THE SYCAMORE LANDFILL INC., A SUBSIDIARY OF ALLIED WASTE INDUSTRIES INC., SYCAMORE LANDFILL, SAN DIEGO COUNTY

TECHNICAL REPORT

JUNE 8, 2005

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION
9174 Sky Park Court, Suite 100, San Diego, California 92123-4340
Phone • (858) 467-2952 • Fax (858) 571-6972
http://www.waterboards.ca.gov/sandiego.

To request copies of Tentative Addendum No. 1 to Order No. 99-74, updating requirements for the Sycamore Landfill please contact Brian McDaniel, Engineering Geologist at (858) 627-3927, or via email at bmcdaniel@waterboards.ca.gov.

Documents also are available at: http://www.waterboards.ca.gov/sandiego

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STATE OF CALIFORNIA

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This report was prepared under the direction of

David T. Barker P.E., *Chief, Water Resource Protection Branch*
John Odermatt P.G., *Senior Engineering Geologist,*

by

Brian McDaniel, *Engineering Geologist*

The purpose of this Technical Report is to summarize information and technical analyses the Regional Board relied on in developing the findings, discharge specifications and prohibitions in Tentative Addendum No. 1 to Order No. 99-74.

BACKGROUND

On September 20, 2004, Governor Schwarzenegger signed AB 1353 into law. AB 1353 makes changes to the Health and Safety Code related to the handling and disposal of treated wood waste. "Treated wood" is defined as wood that has been treated with chemical preservatives for protecting wood against insects, microorganisms, fungi, and other environmental conditions that can lead to decay of the wood. "Treated wood" may include but is not limited to waste wood treated with chromated copper arsenate (CCA), pentachlorophenol, creosote, acid copper chromate (ACC), ammoniacal copper arsenate (ACA), ammoniacal copper zinc arsenate (ACZA), or chromated zinc chloride (CZC).

AB 1353 requires treated wood waste, to be disposed of in either a Class I hazardous waste landfill or in a composite-lined portion of a solid waste landfill unit. The landfill shall meet all requirements applicable to the disposal of municipal solid waste and regulated by waste discharge requirements issued for discharges of designated waste or treated wood waste. AB 1353 requires any solid waste landfill accepting treated wood waste to ensure that the management of treated wood waste complies with applicable Health and Safety Code requirements.

Amendments (2004) to Sections 25143.1.5 and 25150.7 of the California Health and Safety Code specify conditions whereby treated wood waste may be discharged into a composite lined portion of a solid waste landfill unit equipped with either a prescriptive or engineered alternative liner and a leachate collection and removal system.

Tentative Addendum No. 1 to Order No. 99-74 would allow the Sycamore Landfill to accept treated wood wastes for disposal in compliance with the requirements of California Health and Safety Code Sections 25143.1.5 and 25150.7. The tentative addendum specifically restricts the discharge of treated wood wastes to landfill units equipped with a prescriptive or an engineered alternative liner and leachate collection and removal system (LCRS).

The addendum also addresses State Water Resources Control Board (SWRCB) adopted regulations that require the Electronic Submittal of Information (ESI) for soil and groundwater of underground storage tank (UST) cases and non-UST cleanup programs, including Spills-Leaks-Investigations-Cleanups (SLIC) sites, Department of Defense sites (DOD), and Land Disposal programs. For several years, parties responsible for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the internet.

Geotracker is a database and geographic information system (GIS) that provides online access to environmental data. Geotracker allows one to obtain graphical and textual information about any LUFT, Underground Storage Tank (UST), Above Ground Tank (AGT), SLIC, DoD and Landfill site by entering a site address, partial site address, or site name. Other information that can be graphically displayed as a layer on Geotracker, includes highways and roads, topographic maps, surface water boundaries, watershed boundaries, groundwater basins, and hydrologic vulnerability areas. It tracks regulatory data about leaking underground fuel tanks (LUFT), Department of Defense (DoD), Spills-Leaks-Investigations-Cleanups (SLIC) and Landfill sites. Geotracker uses commercially available software to allow users to access data over the Internet.

Beginning July 1, 2005, dischargers are required to submit a complete copy of reports in PDF format into the on-line Geotracker database. The electronic information in Geotracker will be used for all public information requests, regulatory review, and compliance / enforcement activities previously submitted in paper format. Tentative Addendum No. 1 to Order No. 99-74 requires the Dischargers to continue providing the Regional Board with complete copies of all technical submittals. This will allow the Regional Board time to acquire the technical capability to process and manage electronic data. Eventually, the electronic reporting requirements will facilitate public reviews and reduce paper submittals to the Regional Board.

Tentative Addendum No. 1 to Order No. 99-74 would:

a). Allow the Sycamore Landfill to accept treated wood wastes for disposal in compliance with California Health and Safety Code Sections 25143.1.5 and 25150.7 and,

b). Require the Sycamore Landfill to submit future reports electronically, in accordance with Section 3890 *et. seq.*, Title 23, of the California Code of Regulations.

The basis for the findings and directives included in the Addendum is provided below. The finding or directive is first stated in italics followed by an explanation of the Regional Board's basis for the finding or directive.

BASIS FOR FINDINGS AND DIRECTIVES

The findings and directives of the Addendum address Sections 25143.1.5 and 25150.7 of the California Health and Safety Code amended in 2004 specifying conditions whereby treated wood waste may be discharged into a composite lined portion of a solid waste landfill unit equipped with a prescriptive or an engineered alternative liner and leachate collection and removal system.

In addition, the findings and directives of the Addendum address State Water Board adopted regulations that require electronic submittal of information (ESI) for soil and groundwater of underground storage tank (UST) cases and non-UST cleanup programs, including Spills-Leaks-Investigations-Cleanups (SLIC) sites, Department of Defense sites (DOD), and Land Disposal programs.

Findings:

Finding 2: *Sections 25143.1.5 and 25150.7 of the California Health and Safety Code were amended in 2004 specifying conditions whereby treated wood waste may be discharged into a composite lined portion of a solid waste landfill unit equipped with an engineered alternative liner and leachate collection and removal system.*

Finding 3: *Treated wood" means wood that has been treated with a chemical preservative for the purposes of protecting wood against insects, microorganisms, fungi, and other environmental conditions that can lead to decay of the wood and the chemical preservative is registered pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 and following). This may include but is not limited to waste wood that has been treated with chromated copper arsenate (CCA), pentachlorophenol, creosote, acid copper chromate (ACC), ammoniacal copper arsenate (ACA), ammoniacal copper zinc arsenate (ACZA), or chromated zinc chloride (CZC).*

Finding 4: *Treated wood waste, previously treated with a preservative, that has been removed from electric, gas, or telephone service, does not include wood waste that is subject to regulation as a hazardous waste under the federal act.*

Finding 5: *Treated wood must be managed to ensure consistency with Sections 25143.1.5 and 25150.7 of the California Health and Safety Code and if a verified release is detected from the cell unit where treated wood is disposed, the disposal of treated wood will be terminated at the unit with the verified release until corrective action ceases the release.*

Basis: Sections 25143.1.5 and 25150.7 of the California Health and Safety Code were amended in 2004 specifying conditions whereby treated wood waste may be discharged into a composite lined portion of a solid waste landfill unit equipped with an engineered alternative liner and leachate collection and removal system.

Finding 6: *In September 2004, the State Water Resources Control Board (SWRCB) adopted regulations that require electronic submittal of information (ESI) for groundwater cleanup programs. These regulations gained approval from the Office of Administrative Law (OAL) in November 2004. Beginning January 1, 2005, the electronic submittal of these items and a portable data format (PDF) copy of the full report are being extended to include landfill programs. These regulations also added new data dictionaries (the format for electronic data submittals) to California Code of Regulations, Title 27 (27 CCR), in coordination with existing Cal/EPA Unified Program data dictionaries.*

Finding 7: *Beginning July 1, 2005, the submittal of a complete copy of a report in PDF format into the Geotracker database will provide on line access to environmental data. The electronic copy is intended to replace the need for a paper copy and will be used for all public information requests, regulatory review, compliance, and enforcement activities.*

Basis: In September 2004, the State Water Resources Control Board (SWRCB) adopted regulations that require the electronic submittal of information (ESI) for groundwater cleanup programs. For several years, parties responsible for cleanup of leaks from underground storage tanks (LUST) have been required to submit groundwater analytical data, the surveyed locations of monitoring wells, and certain other data to the SWRCB's Geotracker database over the internet. Beginning January 1, 2005, electronic submittal of these items and a portable data format (PDF) copy of the full report is being extended to include landfill programs. The electronic copy will be used for all public information requests, regulatory review, and compliance / enforcement activities previously submitted in paper format. These requirements will facilitate public reviews and reduce paper submittals to the Regional Board.

Prohibitions:

Prohibition A. 12. *The discharge of any treated-wood wastes, previously treated with a preservative, that has been removed from electric, gas, or telephone service and is subject to regulation as a hazardous waste under the federal act is prohibited.*

Basis: Treated wood waste, previously treated with a preservative, that has been removed from electric, gas, or telephone service, does not include wood waste is not subject to regulation as a hazardous waste under the federal act.

Discharge Specifications:

Discharge Specification B.47. *Treated wood wastes may only be discharged into a composite-lined waste management unit meeting all the requirements for a composite liner system and leachate collection and removal system meeting the requirements of Discharge Specifications B. 25 through B. 28, and B. 34 of this Order.*

Discharge Specification B. 48. *If monitoring at the composite-lined portion of a landfill unit at which treated wood waste has been disposed of indicates a verified release, then treated wood waste shall no longer be discharged to that landfill unit until corrective action results in cessation of the release.*

Discharge Specification B. 49. *The discharger shall manage and dispose of treated wood in accordance with all requirements of California Health and Safety Code sections 25143.1.5 and 25150.7*

Basis: Amendments (2004) to sections 25143.1.5 and 25150.7 of the California Health and Safety Code specify conditions whereby treated wood waste may be discharged into a composite lined portion of a solid waste landfill unit equipped with either a prescriptive or engineered alternative liner and a leachate collection and removal system. Tentative Addendum No. 1 to Order No. 99-74 would allow the acceptance of treated wood for disposal in accordance with California Health and Safety Code Sections 25143.1.5 and 25150.7. The addendum restricts the discharge of treated wood to landfill areas equipped with a prescriptive or an engineered alternative liner and leachate collection and removal system (LCRS).

Monitoring Provisions

Monitoring Provision A. 10: After July 1, 2005, the discharger shall submit any reports required by this Order electronically, *in accordance with Section 3890 et. seq. of the California Code of Regulations, Title 23, Division 3. The Discharger shall also continue to provide complete paper copies of all reports to this Regional Board.*

Section F. Reports to be Filed with the Board: *All reports shall be submitted electronically (after July 1, 2005) no later than one month following the end of their respective Reporting Period. The reports shall be comprised of at least the following in addition to the specific contents listed for each respective report type:*

Basis: Tentative Addendum No. 1 to Order No. 99-74 requires the Dischargers to continue providing the Regional Board with complete copies of all technical submittals. This will allow the Regional Board time to acquire the technical capability to process and manage electronic data. Eventually, the electronic reporting requirements will facilitate public reviews and reduce paper submittals to the Regional Board.

In September 2004, the State Water Resources Control Board (SWRCB) adopted regulations that require electronic submittal of information (ESI) for groundwater cleanup programs. These regulations gained approval from the Office of Administrative Law (OAL) in November 2004. Beginning January 1, 2005, the electronic submittal of these items and a portable data format (PDF) copy of the full report are being extended to include landfill programs. These regulations also added new data dictionaries (the format for electronic data submittals) to California Code of Regulations, Title 27 (27 CCR), in coordination with existing Cal/EPA Unified Program data dictionaries.

LIST OF REFERENCE DOCUMENTS

The following documents are included in the Regional Board file and form the basis for Addendum No. 1 to Order No. 99-74:

California Health and Safety Code Sections 25143.1.5 and 25150.7
Assembly Bill 1353