

REGIONAL WATER QUALITY CONTROL BOARD

SAN DIEGO REGION

EXECUTIVE OFFICER SUMMARY REPORT

December 8, 2021

ITEM NO. 3

SUBJECT

Consideration of Tentative Addendum No. 1 to Order No. 87-54, *Waste Discharge Requirements for the City of San Diego, West Miramar Solid Waste Disposal Facility, San Diego County* (Tentative Addendum No. 1). (Amy Grove)

STAFF RECOMMENDATION

Staff recommends adoption of Tentative Addendum No. 1.

KEY ISSUES

- The City of San Diego (City) proposes to vertical expand the Phase II area of the West Miramar Landfill (Landfill) (**Supporting Document 1**). The proposed 25-foot expansion would:
 - Raise the final height of the Landfill from 485 feet to 510 feet above means sea level
 - Provide 6,035,600 cubic yards of additional landfill capacity, to serve the solid waste disposal needs of the City's residents; and
 - Extend the operational lifespan of the Landfill by six years.
- The City's proposal will not expand the Landfill's existing 476-acre footprint.
- Adoption of Tentative Addendum No. 1 will amend the Findings of Order No. 87-54, *Waste Discharge Requirements for the City of San Diego, West Miramar Solid Waste Disposal Facility, San Diego County* (Order No. 87.54) to accurately reflect the Landfill's projected: 1) closure date, 2) total capacity at final build out, and 3) maximum height at final build out. The amended findings will also clarify the classification of the Landfill as a Class III non-hazardous solid waste landfill, under division 2 of California Code of Regulations, Title 27.
- Adoption of Tentative Addendum No. 1 will prohibit the discharge of sewage and water treatment sludge, dredge sediments, and deceased animals in Module 1 of Phase II.

PRACTICAL VISION

The San Diego Water Board's issuance of waste discharge requirements (WDRs) for landfills is a proactive approach to maintaining high quality waters and protecting the beneficial uses within the Region. These WDRs provide technical criteria for the design, construction, operation, and continued maintenance of the landfills and their ancillary containment and monitoring systems for the protection of human health and the environment. The Board's adoption of these types of WDRs align with the mission of the Practical Vision chapter on *Strategize for Healthy Waters*.¹

DISCUSSION

The purpose of this item is to provide the Board with information to assist in its consideration of Tentative Addendum No. 1 to Order No. 87-54. If adopted, Tentative Addendum No. 1 will amend the Findings of Order No. 87-54 to accurately reflect the Landfill's projected: 1) closure date, 2) total capacity at final build out, and 3) maximum height at final build out. The Tentative Addendum No. 1 will also amend Order No. 87-54 to prohibit the discharge of sewage and water treatment sludge, dredge sediments, and deceased animals in Module 1 of Phase II.

The City submitted a Report of Waste Discharge, in the form of a Joint Technical Document (JTD), to the San Diego Water Board on December 15, 2020. San Diego Water Board staff reviewed the JTD and found the information met the State and federal requirements for waste disposal facilities. The City's JTD provides the technical specifications, operational procedures, and slope stability analysis for a proposed 25-foot vertical expansion of the Phase II area of the Landfill. The proposal allows the City to continue waste management and disposal services until 2031.

The Landfill is an 802-acre municipal solid waste disposal site located at Marine Corps Air Station Miramar (**Supporting Document 2**) in the City of San Diego and has been in operation since 1982. The Landfill is divided into two main areas, Phase I to the east and Phase II to the west. The City's proposed vertical expansion is limited to the Phase II area, which includes the following waste management units: Module 1, Module 2/3, and Modules A through E (**Supporting Document 2**). Each of these modules are lined except for Module 1, which the City constructed prior to the adoption of State² and federal³ regulations requiring composite liner systems for non-hazardous waste management units.

Staff also reviewed the Programmatic Environmental Impact Statement (PEIS)⁴ and the Environmental Impact Report (EIR)⁵ to evaluate the potential environmental impacts

¹ Practical Vision: https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

² California Code of Regulations title 27, section 20310(c)

³ Code of Federal Regulations title 40, Part 258.40

⁴ Programmatic Environmental Impact Statement submitted in 1994 and amended in 2007 and 2019.

⁵ Environmental Impact Report submitted in 1994 and amended in 2007 and 2019.

from the proposed vertical expansion project. The PEIS and EIR provided a finding of no significant unmitigated impacts associated with the proposed project.

SIGNIFICANT CHANGES

The significant changes to Order No. 87-54 are:

1. Tentative Addendum No. 1 modifies the findings in existing waste discharge requirements to reflect the proposed build-out conditions of the Landfill.
2. Tentative Addendum No. 1 modifies existing waste discharge requirements to prohibit the acceptance of dewatered sludge, dredged sediments, and deceased animals in Module 1 of Phase II.

COMPLIANCE RECORD

The San Diego Water Board issued two enforcement letters and one notice of violations for the following eight violations of Order No. 87-54:

- Failure to submit the required January - March 1992 and October – December 1992 quarterly groundwater monitoring reports.
- Failure to submit the required January – December 1992 annual groundwater monitoring report.
- Failure to comply with water quality objectives for inorganics and volatile organic compounds including trichloroethene, 1,1-dichloroethane, and dichlorodifluoromethane in groundwater monitoring wells, January 1997.
- Failure to prevent erosion and discharge of sediments into surface waters from Landfill operations in December 1999 and March 2000.
- Failure to prevent discharges of sediment into San Clemente Creek in March 2001.
- Failure to implement and maintain adequate erosion control measures (BMPs) in March 2001.

Since March 2001, no violations of Order No. 87-54 have been recorded.

PUBLIC NOTICE

San Diego Water Board staff sent notification of this action to the Discharger and known interested parties on August 6, 2021 (**Supporting Documents 3 and 4**). Additionally, San Diego Water Board staff posted Tentative Addendum No. 1 to Order No. 87-54 on the San Diego Water Board website on August 11, 2021. The San Diego Water Board received no comments during the public comment period. On November 4, 2021, Staff

notified the City of San Diego and other interested parties that the November board meeting has been cancelled and that the scheduled agenda items will be heard at the December 8, 2021 board meeting. These actions satisfy the 45-day public notification and comment period requirements of California Code of Regulations, title 27, section 21730(b) and Water Code section 13167.5.

SUPPORTING DOCUMENTS

1. Tentative Addendum No. 1 to Order No. 87-54
2. Vicinity and Facility Map
3. Tentative Addendum No. 1 to Order No. 87-54 Transmittal Letter
4. Notice of Public Hearing and Written Comment Period
5. Notice of Rescheduled Public Hearing