

Item Number 3

Supporting Document 1

**Tentative Addendum No. 1
to Order No. 87-54**

November 9-10, 2021

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

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**

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) finds that:

1. The West Miramar Solid Waste Disposal Facility (West Miramar Landfill) is owned by the United States Department of the Navy and has been operated by the City of San Diego (Discharger) since 1982. The West Miramar Landfill is a municipal solid waste (MSW) landfill (Class III waste management unit), accepting municipal solid waste generated within the San Diego region.
2. The West Miramar Landfill is an 802-acre MSW disposal site located within the boundaries of Marine Corps Air Station Miramar. A location map is provided as **Attachment No. 1** to this Addendum.
3. The San Diego Water Board adopted 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) on June 15, 1987. Order No. 87-54 replaced Order No. 82-13 and established site-specific waste discharge requirements and a monitoring and reporting program for the development and operation of the West Miramar Landfill.
4. The San Diego Water Board adopted Order No. 93-86 *Waste Discharge Requirement Amendment for All MSW Landfills in this Region, to Implement State Water Board Resolution No. 93-62, Adopted June 17, 1993, as State Policy for Water Quality Control under Section 13140 of the Water Code* (Order No. 93-86) on August 16, 1993. Order No. 93-86 amended existing waste discharge requirements for all active landfills in the San Diego Region, including Order No. 87-54. Order No. 93-86 established additional requirements to implement the federal subtitle D regulations, which require construction of a liner and leachate collection and removal system at new and expanding landfills.

5. Except as contradicted or superseded by Findings set forth in this Addendum, all Findings in Order No. 87-54 and Order No. 93-86 as amended, are incorporated into this Addendum.
6. A Report of Waste Discharge, in the form of a Joint Technical Document (JTD) was submitted in September 2019 and amended in December 2019. The JTD provides a comprehensive overview of the West Miramar Landfill and includes information on the daily operations, monitoring systems, waste management practices, design and construction specifications, geotechnical analyses, slope stability analyses, and future closure and post-closure maintenance plans and procedures consistent with the requirements found in California Code of Regulations (CCR) title 27, and Code of Federal Regulations (CFR) title 40.
7. The JTD proposes a vertical expansion, resulting in an increase in height from 485¹ feet above mean sea level (amsl) to 510 feet amsl. The 25-foot vertical expansion will result in an additional 6,035,600 cubic yards of airspace and extend the operational life of the West Miramar Landfill by six years. The new proposed closure date for the West Miramar Landfill is 2031.

The proposed vertical expansion is limited to the Phase II area of the West Miramar Landfill. Phase II includes the following waste management units: Module 1, Module 2/3, and Modules A through E. All of the waste management units are lined with the exception of Module 1, which was constructed prior to the adoption of Order 93-86 and is therefore exempted from the State² and federal³ requirements for lined containments systems.

The JTD provided slope stability and leachate generation analyses to demonstrate that the existing underlying containment systems will remain seismically stable, withstand additional stresses from waste placement, and manage the increase in leachate generation resulting from the proposed vertical expansion. The demonstration is consistent with the requirements set forth in CCR title 27, sections 20340 and 21750(f)(5), and indicates that the existing slope configuration, liner and leachate collection systems are capable of supporting additional wastes and their byproducts, and that the West Miramar Landfill will be stable under static and pseudo-static seismic conditions.

8. Adoption of this Addendum is exempt from the California Environmental Quality Act (CEQA) pursuant to CCR title 14, section 15301 because implementation of the vertical expansion will not expand the West Miramar Landfill beyond the 476-

¹ As approved by CalRecycle and recorded in Solid Waste Facility Permit 37-AA-0020 (December 2014)

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

³ Code of Federal Regulations title 40, Part 258.40

acre landfill footprint previously approved and evaluated under CEQA. The footprint for the West Miramar Landfill was approved in Order No. 87-54, which defines the potential significant environmental impacts associated with landfill development and the mitigation measures to address these impacts, as identified in the 1981 EIR.

In 1994, the City of San Diego and the U.S. Department of the Navy completed a Programmatic Environmental Impact Statement (PEIS) and Environmental Impact Report (EIR) to address the General Development Plan for the entire landfill lease area. The PEIS/EIR address environmental concerns associated with the proposed vertical expansion of the West Miramar Landfill. The PEIS/EIR provided a finding of no significant unmitigated impacts with the exception of potential visual and air quality impacts. In 2007, the City of San Diego prepared an EIS/EIR to evaluate potential environmental impacts associated with another 20-foot vertical expansion of the West Miramar Landfill. The EIS/EIR again provided a finding of no significant unmitigated impacts associated with a vertical expansion of the West Miramar Landfill. In 2019, an addendum to the 2007 EIS/EIR was prepared in support of the proposed 25-foot vertical expansion presented in the Tentative Addendum and provided a finding of no new significant unmitigated impacts associated with the project.

9. The State Water Resources Control board (State Water Board) established California's Antidegradation Policy in Resolution No. 68-18, *Statement of Policy with Respect to Maintaining high Quality Waters in California*, (Resolution No. 68-16). Resolution No. 68-16 requires existing quality of waters be maintained unless degradation is justified based on specific findings. The San Diego Water Board's *Water Quality Control Plan for the San Diego Basin (9)* (Basin Plan) implements and incorporates by reference both the State and federal antidegradation policies.

The West Miramar Landfill is located in the Miramar Hydrographic Subunit (6.4) of the Penasquitos Hydrographic Unit. Order Nos. 87-54 and 93-86 require the Discharger to design, construct and maintain waste containment systems to prevent discharges of waste and waste constituents to waters of the State. Groundwater monitoring results indicate that legacy releases of landfill gas and leachate from buried wastes in unlined portions of the West Miramar Landfill have been discharged to groundwater beneath the West Miramar Landfill. However, groundwater within the vicinity of the site is exempted from municipal beneficial uses and water quality protection standards do not apply. Nevertheless, the Addendum is consistent with Resolution No. 68-16 because it requires the Discharger to ensure that containment structures are capable of containing wastes

and preventing discharges of waste degradation byproducts to groundwater and surface waters.

10. The San Diego Water Board notified the Discharger, and all known interested parties of its intent to consider adoption of this Addendum.
11. The San Diego Water Board considered all comments received in a public meeting pertaining to this Addendum.

IT IS HEREBY ORDERED that Order No. 87-54 is amended as follows:

1. Revise Finding No. 4 to read as follows:

The West Miramar Solid Waste Disposal Facility is operated by the City of San Diego, Solid Waste Division. The legal property owner, the U.S. Department of the Navy Miramar Naval Marine Corps Air Station Miramar, leases the land to the City of San Diego. The disposal operation began in 1982 and is expected to continue until ~~2004~~ 2031 when it is expected to reach capacity.

2. Revise Finding No. 5 to read as follows:

The ~~870~~ 802-acre landfill site is located in the City of San Diego east of I-805, south of the U.S. Department of the Navy's Miramar Naval Marine Corps Air Station Miramar, west of the existing North Miramar Sanitary Landfill and north of San Clemente Canyon. The site is located in the Miramar Hydrographic Subunit (6.4) of the Penasquitos Hydrographic Unit, in portions of Sections 22, 23 and 24, T15S, R3W, SBB&M. The site location is shown on Attachment "A" to this Order.

3. Revise Finding No. 10 to read as follows:

~~In the Report of Waste Discharge, the City of San Diego proposed to discharge an average of 3,500 tons per day (6,140 cubic yards per day) of municipal solid waste. The total capacity of the landfill with the proposed vertical expansion is approximately 36,000,000~~ 93,765,600 cubic yards.

4. Revise Finding No. 11 to read as follows:

The landfill site is located adjacent to San Clemente Canyon Creek, which flows west. Within the site a series of north/south tributary canyons divide the area into a number of flat plateaus. ~~Present~~ g Ground elevations of the site range between 237 feet above mean sea level (MSL) at the canyon floor and ~~428 MSL at the edge of the mesa area. The completed site will consist of two plateaus with a maximum elevation of 470~~ 510 feet above MSL at final build out.

5. Revise Finding No. 17 to read as follows:

Under criteria established by the 1972 version of the Subchapter 15, the West Miramar Solid Waste Disposal Facility was classified as a Class II-2 disposal site. ~~The West Miramar Solid Waste Disposal Facility will be reclassified under criteria established by the 1984 version of Subchapter 15 when these waste discharge requirements are revised or new waste discharge requirements are issued to fully implement Subchapter 15.~~ Under the criteria established in California Code of Regulations title 27, the Miramar Solid Waste Disposal Facility is classified as a Class III nonhazardous municipal solid waste landfill.

6. Revise Finding No. 27 to read as follows:

~~This facility is an existing facility and as such is exempt from the provisions of the California Environmental Quality Act, in accordance with Title 14, California Administrative Code, Chapter 3, Article 19. Section 15304. Issuance of waste discharge requirements and a monitoring and reporting program by the San Diego Water Board is a project under the California Environmental Quality Act (CEQA). A final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) was certified by the City of San Diego on <insert date here> to satisfy the requirements of the National Environmental policy Act (NEPA) and CEQA.~~

7. Add Prohibition A.13 as follows:

13. Discharges of sewage and water treatment sludge, dredged sediments, and dead animals in Module 1 of Phase II are prohibited.

I, David W. Gibson, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of this Addendum, adopted by the California Regional Water Quality Control Board, San Diego Region, on November 10, 2021.

TENTATIVE

David W. Gibson, Executive Officer