

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

San Diego Regional Water Quality Control Board

October 17, 2017

Mr. Neil Mohr
General Manager
Sycamore Landfill Inc.
8514 Mast Boulevard
Santee, CA 92071

In reply refer to / attn:
259845:BBushnell

Subject: Review of Monitoring Reports for Order No. 99-74, Sycamore Canyon Landfill

Mr. Mohr:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the monitoring reports listed in the table below. Allied Waste Industries, Inc. submitted the monitoring reports as required by the Monitoring and Reporting Program of Order No. 99-74.

Table: Monitoring Reports Submitted

Report Type	Report Date
Semiannual Groundwater, Maintenance, Monitoring, and Corrective Action Evaluation Reports	October-March 2014/2015, April-September 2015, October-March 2015/2016, April-September 2016 and October-March 2016/2017
Annual Groundwater, Maintenance, and Monitoring Reports	April-March 2014/2015, April-March 2015/2016 and April-March 2016/2017

The San Diego Water Board had the following comments:

The City of San Diego Local Enforcement Agency (LEA) notified the San Diego Water Board of a failure of the storm water conveyance system which resulted in severe erosion and washout of a portion of the landfill cover at Sycamore Landfill. The wash out took place during the April-March 2016/2017 monitoring period and caused waste to be deposited in the drainage course and catchment basin at the facility. The San Diego Water Board staff conducted a site visit on March 7, 2017 after being notified of the site conditions by the City LEA staff.

The observed site conditions included a compromise of the landfill cover system that was created by the failiure of the storm water conveyance system, and created the following potential violations of Order No. 99-74:

1. Section A.7 of Order No. 99-74 states that no solid waste should be left in the storm water drainage courses. The slope failure that took place during the April-March 2016/2017 monitoring period caused waste to be deposited in the drainage course and catchment basin at the facility.
2. Section B.16 of Order No. 99-74 states that any water that comes into contact with waste shall be treated as leachate. It is not clear if the storm water came into contact with the wastes, and if such water was properly treated and disposed of in compliance with Order No. 99-74.
3. Section D.5 of Order No. 99-74 states that the facility be properly maintained and operated to ensure compliance with the order. The erosion and drainage control systems were not properly maintained, causing waste to be exposed in violation of the order.
4. Section D.6 of Order No. 99-74 states that the discharger shall report any noncompliance, which may endanger health or the environment within 5 days of occurrence.
5. Section D.7 of Order No. 99-74 states that the discharger should immediately notify the water board of any slope failure or occurrence that jeopardizes the integrity of the cover system.
6. Section 3.C of the Monitoring and Reporting Program requires that the discharger discuss a comprehensive compliance record in the annual reports and any corrective actions being taken. The failure of the storm water conveyance system and severe erosion of the landfill cover system during a significant storm event should have been documented in next available annual report.

The Discharger should add an appendix to the next semi-annual monitoring report that includes a the following written discussion/documentation:

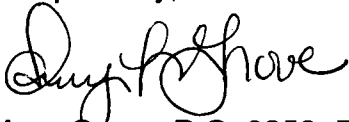
1. The Discharger should provide the San Diego Water Board with a description and documentation of the measures taken or implemented to prevent waste from entering into the storm water drainage system in the future.
2. Please provide a description and documentation describing the measures used to treat and dispose of any runoff that came into contact with waste due to the slope failure that took place during the April – March 2016/2017 monitoring period.
3. The Discharger should provide a description of the mitigation measures that have been implemented to enhance the maintenance of the the storm water conveyance system to prevent a future washout of the cover system.

- 4. According to our records, the San Diego Water Board was not notified of the failure of the storm water conveyance system during the April-March 2016/2017 monitoring period. In the future, the Discharger must immediately notify the San Diego Water Board of a failure of the storm water conveyance system. Failure to do so may result in a potential enforcement action.

- 5. The failure of the storm water conveyance system during a significant storm event and the resulting significant erosion of the landfill cover and wastes should have been documented in annual report. In the future, significant impacts to the landfill that could compromise the integrity of the cover system or any other engineered waste containment systems (e.g., liner systems, leachate conveyance system, storm water conveyance system, etc.) should be well documented in the next available regular monitoring report.

In the subject line of any response, please include reference **259845:BBushnell**. Please contact Mr. Brandon Bushnell at 619-521-8044, or at brandon.bushnell@waterboards.ca.gov if you have any questions or comments.

Respectfully,



Amy Grove, P.G. 9258, Engineering Geologist
Groundwater Protection Unit

Tech Staff Info & Use	
Place ID	259845
Reg. Measure ID	147420
SEL Reg Measure ID	414640
Violation IDs	1028016, 1028017, 1028018, 1028019, 1028020, 1028021

AG: bb