

Los Osos Closed Landfill Meeting Minutes

Date/Time: December 4, 2012, 10:30 am
Location: Public Works Conference Room 207
Attendees: Paavo Ogren, Dean Benedix, Kari Graton – San Luis Obispo County
Tom Vercoutere (on phone) – Golder Associates
John Robertson (on phone), Thea Tryon, Dean Thomas, Ryan Lodge –
RWQCB

County and Water Board staff agreed that some type of pump and treat system for the landfill was necessary to control the volatile organic compounds (VOC) plume at the toe of the landfill. County staff proposed bringing a budget proposal to the County Board of Supervisors in February that includes costs associated with pilot projects and full scale treatment and disposal options for a full-scale pump and treat system that will significantly reduce further migration of VOCs at the point of compliance (edge of waste).

Water Board staff emphasized the need to move beyond a basic 24-hour pump test and to evaluate installing observation well(s) then pumping to understand the aquifer parameters and radius of influence/capture zone of pumped well(s). The County acknowledged the need to take a more aggressive approach but indicated they can't do anything without Board of Supervisor's approval.

Mr. Ogren indicated that County staff would come up with a proposal for the Board of Supervisors that will cover the entire project budget at one time so they do not have to keep going back to the Board for funds for each project phase. Mr. Ogren said he would share that proposal with Water Board staff. Water Board staff indicated that if Board of Supervisors did not agree to fund the project that they would have no choice but to consider enforcement action to ensure landfill comes into compliance with current regulatory orders.



Los Osos Landfill
Lodge, Ryan@Waterboards

to:
kmgraton@co.slo.ca.us
01/30/2013 08:38 AM

Hide Details

From: "Lodge, Ryan@Waterboards" <Ryan.Lodge@waterboards.ca.gov>

To: "kmgraton@co.slo.ca.us" <kmgraton@co.slo.ca.us>

History: This message has been replied to and forwarded.

Kari,

On the phone you asked about code sections that the County is currently violating for the Los Osos Landfill. California Water Code section 13263 provides the Water Board the authority to issue Waste Discharge Requirements (WDR). The Los Osos Landfill is covered by WDR No. R3-2007-0023. The Landfill is currently in violation of WDR No. R3-2007-0023. I have included two sections of the WDRs that are being violated (there may be others but these are two examples). These are located under WDR section D. Water Quality Protection Standards:

1. The discharge of waste shall not cause a statistically significant difference in water quality over background concentrations for proposed Concentration Limits for each Constituent of Concern or Monitoring Parameter (per MRP Order No. R3-2007-0023) at the Point of Compliance. The Point of Compliance is the edge of the waste and extends vertically down through the uppermost water-bearing zone. The Discharger must maintain the Concentration Limits for as long as the waste poses a threat to water quality. Discharge of waste shall not adversely impact the quality of State waters.
2. Discharge of waste shall not cause concentrations of chemicals and radionuclides in groundwater downgradient of the Landfill to exceed the State Department of Health Services latest recommended Drinking Water Action Levels or MCL of the California Code of Regulations Title 22, Division 4, Chapter 15, Article 5.5.

As you know, and have documented through the monitoring and reporting program, downgradient groundwater

exceeds concentrations limits and MCLs for certain constituents.

Violations of WDRs subject the County to civil liability of up to \$5,000 for each day the violation occurs per California Water Code section 13350(a)(2) and (e).

A Notice of Violation would outline the violations of Order No. R3-2007-0023 including those listed above. The NOV would be issued pursuant to California Water Code Section 13267 requiring the County submit a report detailing corrective actions proposed by the County to comply with WDRs and would require a compliance schedule. We would most likely issue a time schedule order to make any cleanup schedule enforceable.

Let me know if this is helpful or if you need any additional information. This was a quick review and any formal enforcement could include more code sections, WDR sections, violations, etc. and therefore this is an incomplete list and should be considered in that context.

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