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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION
CEASE AND DESIST ORDER NO. R5-202X-XXXX

FOR
WESTERN PLACER WASTE MANAGEMENT AUTHORITY
AND
FCC ENVIRONMENTAL SERVICES CALIFORNIA, LLC

FOR
WESTERN REGIONAL SANITARY LANDFILL FACILITY
CONSTRUCTION AND OPERATION
CLASS II AND CLASS III LANDFILLS
PLACER COUNTY

This Cease and Desist Order (Order) is issued to Western Placer Waste Management Authority (WPWMA) (Discharger) based on provisions of Water Code section 13301, which authorizes the Central Valley Regional Water Quality Control Board (Central Valley Water Board) to issue an order requiring a discharger in violation of its waste discharge requirements to comply with those requirements and, in the event of a threatened violation, take appropriate remedial or preventative action, and Water Code section 13267, which authorizes the Board to require the preparation and submittal of technical and monitoring reports.

As described herein, the Central Valley Water Board finds that the Discharger has violated *Waste Discharge Requirements Order R5-2007-0047* (WDRs) in a manner that has resulted in unauthorized discharges of waste, and threatened discharges of waste, to surface and ground waters of the state. This Order requires the Discharger to restore compliance with the WDRs and to perform investigation, cleanup, and remediation tasks necessary to resolve actual or threatened impacts to water quality.

The Central Valley Water Board finds that:

Discharger and Facility Information

1. The WPWMA is a joint powers organization formed through a joint exercise of powers agreement between Placer County and the cities of Lincoln, Roseville, and Rocklin. WPWMA owns the Western Regional Sanitary Landfill Facility (Facility), maintains staff at the Facility, and oversees day-to-day operations and periodic monitoring at the Facility. The Discharger employs, under contract, FCC Environmental Services California, LLC (FCC) for day-to-day Facility operations and maintenance.
2. The Facility is a municipal solid waste landfill located about 5.5 miles north-northeast of the City of Roseville, in Section 6, T11N, R6E, MDB&M, as shown in Attachment A of the WDRs. The Facility covers approximately 291 acres at 3195 Athens Road, Lincoln, California 95648, of which 231 acres are permitted for disposal activities. The Facility is located on Placer County Assessor's Parcel Numbers (APNs) 017-063-001-000 and 017-063-002-000.

3. The Facility consists of two waste management units (WMUs) – a Class II WMU and a Class III WMU. The Class II WMU is made up of eight (8) modules: future modules 7, 8, and 9, and existing modules 5, 6, 14, 15, and 16. The Class III WMU is made up of six (6) modules; Modules 1, 2, 10, 11, 12, and 13. These WMUs and their modules are shown in Attachment B of the WDRs. Landfill modules are not separate WMUs but are designations for operational planning. Central Valley Water Board staff conditionally approved Module 6 in a 29 July 2025 letter; however, waste may only be disposed of in the southwestern portion of the WMU as shown in the 29 July 2025 letter. The remaining portion of Module 6 has not been approved for use by Central Valley Water Board staff, and proposed WMU Modules 7, 8, and 9, have not been approved for construction or use by Central Valley Water Board staff.

Factual Basis for This Order

4. On 4 May 2007, the Central Valley Water Board adopted the WDRs, authorizing the Discharger to discharge waste into completed Class II and Class III WMUs at the Facility in accordance with specific conditions, requirements, limitations, and prohibitions. The WDRs incorporate the requirements of *Monitoring and Report Program Order R5-2007-0047* (MRP) and the Central Valley Water Board's *Standard Provisions and Reporting Requirements for Waste Discharge Requirements for Nonhazardous Solid Waste Discharges Regulated by Title 27 and/or Subtitle D (April 2000)* (SPRRs). The WDRs implement the following regulations and policies, among others:
 - a. The *Water Quality Control Plan for the Sacramento River Basin and the San Joaquin River Basin* (Basin Plan);
 - b. The prescriptive standards and performance goals of California Code of Regulations, title 27 (Title 27), division 2, subdivision 1, chapters 1 through 7 (see WDRs, Provision H.2);
 - c. The prescriptive standards and performance criteria of 40 Code of Federal Regulations parts 257 and 258; and
 - d. State Water Resources Control Board (State Water Board) Resolution 93-62, *Policy for Regulation of Discharges of Municipal Solid Waste*, adopted 17 June 1993.

The WDRs include enforceable standards and specifications for the construction, operation, closure, post-closure maintenance, and corrective action of existing and future WMUs at the Facility.

Ongoing Discharge of VOCs to Groundwater and Failure to Submit Revised Corrective Action Program

5. On 17 January 2019, the Central Valley Water Board issued a Notice of Violation (NOV) to the Discharger for ongoing discharges of volatile organic compounds

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(VOCs) and inorganic constituents to groundwater in violation of WDRs Prohibition A.2. The NOV noted that although “VOCs were first observed in groundwater beneath the Facility in 1995,” and “the Discharger established a corrective action program in 1997,” VOCs and inorganics, primarily bicarbonate, persist in groundwater beneath the Facility and along the Facility boundary. (17 Jan. 2019 NOV, p.4.) Accordingly, the NOV directed the Discharger to submit, by 1 July 2019, an amended Report of Waste Discharge (AROWD) proposing enhancements to the Facility’s corrective action program (CAP) and a time schedule for implementing those enhancements, as required by the WDRs and Title 27 section 20430(j).¹

6. In a 2 July 2019 letter to the Board, the Discharger stated that it was not prepared to submit the AROWD. The Discharger proposed that it would instead submit, by 30 September 2019, an *Engineering Feasibility Study* (EFS) to identify and evaluate possible corrective actions. The Discharger, after receiving Board approval of its EFS, stated that it would submit the AROWD including the enhanced CAP within 120 days. Central Valley Water Board staff responded in a 9 September 2019 email stating in part that WPWMA is and will remain in violation of the directive to submit a ROWD by 1 July 2019 until the document is submitted.
7. On 23 October 2019, the Discharger submitted a letter to the Board requesting a revised schedule from its July 2019 letter. The revised schedule indicated that the EFS would be submitted by 31 December 2019 and the AROWD would be submitted within 120 days following Board approval of the EFS. In response, Central Valley Water Board staff stated in an 11 December 2019 email that WPWMA remained out of compliance with the directive until the requested ROWD is submitted.
8. On 31 December 2019, the Discharger submitted the EFS for Central Valley Water Board staff review. In the EFS, the Discharger proposed to remediate VOC impacts to groundwater via a combination of ongoing landfill gas (LFG) extraction and Monitored Natural Attenuation (MNA). However, the EFS acknowledged that “. . . a more aggressive approach, involving groundwater extraction in the impact areas, may be appropriate.” (EFS, p. 25.) To this end, the Discharger also proposed an aquifer pump test to determine the feasibility of groundwater extraction and to obtain additional site-specific data necessary to design an effective CAP for the Facility.
9. In a 27 February 2020 letter, Central Valley Water Board staff responded to the EFS, stating that MNA does not meet the requirements for a CAP as outlined in Title 27 and requested submission of a work plan to conduct the groundwater pump test proposed in the EFS. This work plan was to contain an expedited schedule to: 1)

¹ Title 27 section 20430(j), states, “Any time the [Board] determines that [a CAP] does not satisfy the requirements of this section, the discharger shall, within 90 days of receiving written notification of such determination by the RWQCB, submit an amended report of waste discharge to make appropriate changes to the program.”

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complete the proposed pump test, 2) complete a design report for groundwater corrective action, to be submitted as an AROWD, 3) complete construction documents, 4) construct the proposed system, 5) obtain authorization to discharge from the system, and 6) begin groundwater remediation. In accordance with WDRs Provision H.2 and Title 27 section 20425(d), the letter stated that the Discharger was to submit an AROWD within 90-days of completion of the groundwater pump test proposed in the *EFS*.

10. On 15 April 2020, the Discharger submitted the requested *Aquifer Test Work Plan*, which proposed the installation of two eight-inch diameter extraction wells (EX-1 and EX-2) just downgradient of Modules 1, 2, 10, and 11, and the completion of two separate, independent aquifer tests using extraction wells EX-1 and EX-2.
11. On 30 July 2020, Central Valley Water Board staff conditionally approved the *Aquifer Test Work Plan* and directed the Discharger to submit, by 31 December 2020, a report documenting the results of the completed scope work. Central Valley Water Board staff further directed that, within 90 days after submitting the Work Plan implementation report (i.e., by 31 March 2021), that the Discharger submit the AROWD. Neither document was submitted before the stated due dates.
12. On 16 September 2021, the Central Valley Water Board issued an NOV for, among other things, the Discharger's failure to submit an AROWD to enhance the Facility's CAP, as originally requested in the 17 January 2019 NOV.
13. On 20 December 2021, Central Valley Water Board staff met with the Discharger. The Discharger stated that the approved aquifer pump test had been completed and that a report documenting the work would be submitted soon.
14. On 19 January 2022, the Discharger submitted the *Focused Engineering Feasibility Study Groundwater Pump & Treat System Report* (dated 27 December 2021) (*Focused EFS Report*), which contained a proposal to install a groundwater extraction and treatment system to contain, capture, and treat VOC impacted groundwater from unlined WMU Modules 1, 2, 10, and 11. As stated in Central Valley Water Board staff's 30 July 2020 conditional approval of the *Aquifer Test Work Plan*, an AROWD proposing an enhanced CAP was due by 31 March 2021.
15. On 19 April 2022, Central Valley Water Board staff met with the Discharger to discuss the Focused EFS Report. The Discharger stated its belief that the long-term cost of groundwater extraction would outweigh the anticipated benefits and that the existing corrective action measures, consisting of a recently improved LFG extraction system, would likely prevent further releases of VOCs to groundwater. The Discharger predicted that through ongoing operation of the improved LFG extraction system and natural attenuation, the residual VOC impacts observed in groundwater would likely attenuate within approximately five (5) to ten (10) years.

Central Valley Water Board staff informed the Discharger that existing corrective

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measures were insufficient and that the impacts to groundwater must be addressed in a more proactive manner, as required by the WDRs and Title 27. However, Central Valley Water Board staff also stated that they are willing to consider other proposed alternatives to groundwater extraction and treatment. Central Valley Water Board staff requested that the Discharger submit, by 22 April 2022, an email stating whether it intended to move forward with the groundwater extraction and treatment currently proposed in the *Focused EFS* or, instead, to submit a revised CAP proposal.

16. In a 26 April 2022 email, the Discharger informed Central Valley Water Board staff that it intended to pursue alternative remedial measures prior to making a final determination to long-term groundwater extraction and treatment. It stated that it would submit a schedule to verify that the landfill cover, LFG controls, and groundwater monitoring systems were designed, operated, and maintained to optimize the current CAP.
17. In a 7 September 2022 email, the Discharger stated that it would submit, after 13 October 2022, the previously promised schedule to: 1) verify and augment the cover and 2) renovate and retune the LFG control system to optimize LFG capture across WMU Modules 1, 2, 10 and 11. Central Valley Water Board staff responded in a 12 September 2022 email directing the Discharger to submit their proposed schedule as soon as possible.
18. The Discharger did not submit a schedule (report) to implement alternative remedial measures, as originally proposed by the Discharger during the 19 April 2022 meeting and subsequently promised by the Discharger in their 26 April 2022 and 7 September 2022 emails. The intent of the proposed schedule (report) was for the Discharger to establish a timeline by which they would implement their proposed alternative remedial measures, to address the VOC and inorganic impacts that persist in groundwater beneath the Facility.
19. On 18 November 2024, Central Valley Water Board staff issued an NOV to the Discharger for discharges of waste, VOCs in the vadose zone and groundwater, outside the Facility's Class III WMU, and directed the Discharger to submit: 1) a Work Plan to further define the nature and extent of the identified release of waste to the vadose zone and groundwater, between POC wells MW-5, MW-9, and MW-10, and downgradient wells MW-2 and MW-24, in accordance with Provision H.2 of the WDRs and Sections 20425(i) and 20430(j) of Title 27, and 2) an AROWD, completed as a Revised Correct Action Plan (Revised CAP), to make appropriate changes to the Facility's CAP, in accordance with Provision H.2 of the WDRs and Title 27 section 20430(j).
20. In response to the 18 November 2024 NOV, the Discharger submitted the 27 December 2024 *Impact Delineation Work Plan (Delineation Work Plan)* and the 13 January 2025 *Revised Corrective Action Plan (Revised CAP)*.

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21. In a 25 August 2025 letter, Central Valley Water Board staff requested a revised *Delineation Work Plan* to define the nature and extent of the identified release of waste to the vadose zone and groundwater beneath and downgradient of the Facility. In response, the Discharger submitted the 21 November 2025 *Impact Delineation Work Plan Revision 1*, which Central Valley Water Board staff conditionally approved in a 6 January 2026 letter.
22. In a 26 August 2025 letter, Central Valley Water Board staff conditionally approved the January 2025 *Revised CAP*. However, the *Revised CAP* only contains a proposal to make use of the Facility's existing landfill gas (LFG) extraction system, supplementing the system as needed, to reduce potential LFG migration from the unlined footprint of Modules 1, 2, 10, and 11.
23. Based on the 2025 Annual Report, the maximum concentrations of VOCs detected in the Corrective Action Program wells in 2025 are as follows: Benzene at 0.86 micrograms per liter (µg/L), 1,4-Dichlorobenzene at 0.67 µg/L, 1,1-Dichloroethane at 8.6 µg/L, 1,1-Dichloroethene at 0.42 µg/L, cis-1,2-Dichloroethene at 61.0 µg/L, trans-1,2-Dichloroethene at 0.49 µg/L, Tetrachloroethene at 26.0 µg/L, Trichloroethene at 21.0 µg/L, and Vinyl Chloride at 2.6 µg/L.
24. Based on the 2025 Annual Report, Tetrachloroethene continues to persist in downgradient monitoring well MW-2 at an estimated "J" flagged value of 0.21µg/L. Monitoring well MW-2 is located along the western perimeter of the Facility, approximately 120 feet downgradient of WMU Modules 10 and 11 and 160 feet downgradient of Module 1.
25. Based on the 2 February 2026 Modules 1, 2, 10, & 11 Corrective Action Plan Semi-Annual Update, methane levels within unlined Modules 1, 2, 10, and 11 persist between 14.6 and 49 percent by volume and exceed 20 percent by volume west downgradient of Modules 10 and 30 percent by volume west downgradient of Module 11. Elevated Methane within the WMU and within the vadose zone downgradient outside of these WMUs, pose a continued threat to groundwater, which has already been impacted by discharges from these unlined WMUs,

Unauthorized Soil Stockpiling atop Closed Class III WMU Modules

26. In a 4 March 2022 submission to the Board, the Discharger proposed to stockpile approximately one million cubic yards of soil atop Class III WMU Modules 1, 2, 10, and 11; the proposed soil stockpiles would stand approximately 30 to 50 feet above the final covers of the underlying WMU modules. The Discharger stated that the proposed stockpile area was the only available on-site area in which it could stockpile this amount of soil "in a timely manner to allow for prompt construction of Module 6." Modules 1, 2, and 10 are unlined; Module 11 is partially lined.
27. In a 19 September 2022 response to the 4 March 2022 submission, Central Valley Water Board staff provided comments on the proposed soil stockpiling plan. Among those comments, Central Valley Water Board staff noted that the proposed soil

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stockpiling:

- a. Could interfere with the operation of LFG extraction wells that serve as a key element of the Facility's CAP for ongoing VOC discharges to groundwater; the submission did not address this issue.
- b. Could cause discharges of leachate to groundwater. Although the Discharger's submission contended that this outcome was unlikely to occur, Central Valley Water Board staff noted that this contention was based on generalized assumptions rather than site-specific data.
- c. Would impair and/or prevent the Discharger from complying with the WDRs' post-closure maintenance requirements.

Central Valley Water Board staff also noted that, before the proposed stockpiling could be approved, the Discharger would need to submit assorted technical documents, submit an updated Report of Waste Discharge / Joint Technical Document (ROWD/JTD), and provide documentation of compliance with the California Environmental Quality Act (CEQA) and local land use requirements. For all these reasons, the response letter concluded, "At this time Central Valley Water Board staff cannot approve this project due to the issues noted above. Please coordinate with the Central Valley Water Board, CalRecycle, and the Local Enforcement Agency if further correspondence is necessary."

28. On 30 September 2022, Central Valley Water Board staff were notified that the Discharger was stockpiling soil excavated from Module 6 on top of closed Class III WMU Modules 1, 2, 10, and 11 prior to receiving formal authorization.
29. On 4 October 2022, Central Valley Water Board staff met the Discharger onsite to observe and discuss the unauthorized stockpiling of soil atop Modules 1, 2, 10, and 11. The Discharger explained that documents had been submitted to the Central Valley Water Board's Permitting Unit explaining the proposed project, and that the Discharger had discussed the project with the Permitting Unit on multiple occasions. However, no formal approval had been granted. Enclosure 1 to this Order contains a timeline provided by the Discharger of their correspondence with Central Valley Water Board staff regarding their request to stockpile soil atop WMU Modules 1, 2, 10, and 11. The Discharger also stated that the soil placed atop these closed modules would only be for "temporary storage" (approximately 15-years). The soil stockpiles atop Modules 1, 2, 10, and 11 cover approximately 40 acres of these four closed WMU modules, and the thickness of the soil stockpile varies across the modules.
30. On 6 October 2022, the Central Valley Water Board issued an NOV to the Discharger for, among other things, its unauthorized placement of an unknown volume (now known to be approximately 1.4 million cubic yards) of soil atop previously closed waste modules. The NOV explained that the stockpiling of soil was a violation of the Discharger's WDRs because it did not accord with requirements

concerning the Discharger's Board-approved Closure and Post-Closure Maintenance Plan for Modules 1, 2, 10, and 11, nor related adjustments to the Discharger's required financial assurances. (See WDRs, Provisions 16-18; see Title 27, §§ 21750, 21769.)

31. During the 6 October 2022 Facility Inspection, the Discharger stated that they had abandoned numerous LFG extraction wells atop Modules 1, 2, 10, and 11 prior to stockpiling soil atop these Modules. According to the Discharger, as outlined in the 13 January 2025 Revised Corrective Action Plan, 24 LFG extraction wells were present atop Modules 1, 2, 10, and 11 prior to stockpiling soil.
32. In April 2023, nine LFG extraction wells were installed through the 1.4 million cubic yards of soil atop Modules 1, 2, 10, and 11 to replace the LFG wells removed to facilitate the stockpiling of soil atop Modules 1, 2, 10, and 11.
33. The stockpiled soil atop Modules 1, 2, 10, and 11, even with some replacement LFG extraction wells, complicates LFG extraction by limiting natural off-gassing, shifting the generated gas pressure gradient outward and down towards the vadose zone and groundwater, and limiting access to the WMU for the installation of additional LFG extraction wells or any other proposed alternative corrective action measures the Discharger may propose to address ongoing impacts to the vadose zone and groundwater beneath and downgradient of Modules 1, 2, 10, and 11.
34. The unauthorized soil stockpiling has also resulted in significant impacts to storm water drainage courses due to significant erosion across the soil stockpiles. Additionally, the reduction in LFG extraction, combined with the expansion of a LFG halo containing higher concentrations of VOCs, is expected to increase subsurface LFG concentrations, further reduce LFG extraction efficiency, impair waste compaction, elevate leachate production, increase the potential for groundwater impacts, and compromise slope stability.

Elevated Leachate Level Exceedances in The Facility's LCRS Sumps

35. Since 1 January 2026, leachate levels in at least four of the Facility's eleven leachate collection and removal system (LCRS) collection sumps, sumps LS5, LS-6, LS-15, and LS16W, have been recorded above the limits set by the WDRs. Additionally, leachate levels in LS6 have been recorded as high as 4.68 feet above the LS6 LCRS leachate limit, and leachate levels in LS15 have been recorded as high as 6.54 feet above the LS15 LCRS leachate limit. While the level of leachate in LS15 has dropped below the WDR limit, leachate levels were recorded above the limit in LS15 for three consecutive months, between January and March 2026. The level of leachate in the LS6 LCRS sump continues to exceed the limit set in the WDRs and has for all of 2026 with the exception of 15 days between 31 March and 13 April 2026. Each record exceedance is a violation of the WDRs, and more aggressive action should be taken to correct any LCRS sump exceedance, given failure to maintain compliance with these limits increases the likelihood of a leachate release from the

MWU.

Module 16 Cover Damage & Repair

36. On 27 October 2021, the Discharger notified Central Valley Water Board staff of a seep flowing out of the drainage system/pipe for the Partial Final Cover System for Module 16, which was installed in 2015. According to the Discharger, seeps had previously occurred at this location.
37. On 1 June 2023, the Discharger notified Central Valley Water Board staff that exploratory work around the Module 16 seep had begun, and that they had identified a small separation along one of the seams of the Module 16 Final Cover System.
38. On 12 October 2023, the Discharger submitted the 9 October 2023 *Module 16 Final Cover System Repair Workplan*, which describes its plans to repair the Module 16 Final Cover System. In a 19 October 2023 letter, Central Valley Water Board staff conditionally approved this work plan.
39. The 6 December 2023 *Annual Facility Inspection Report* states the Module 16 seep was repaired on 29 September 2023. However, as noted above, the work plan to repair this Module 16 seep was not approved until 12 October 2023.
40. On 28 December 2023, the Discharger observed a small amount of leachate resurfacing from the same drainage pipe associated with the previous damage and subsequent repair of the Module 16 Partial Final Cover System seep.
41. In a 9 January 2024 letter, the Discharger stated that they would complete exploratory operations around the new Module 16 leachate seep during the spring or summer of 2024, once weather permitted. No reports documenting this proposed scope of work were ever submitted.
42. On 3 February 2025, the Discharger submitted the February 2025, *2025 Module 16 Seep Investigation and Repair Work Plan*.
43. On 3 March 2025, a new Module 16 Seep was discovered just northwest of the original Module 16 seep in the base of the perimeter storm water drainage channel. Given the location of this new 2025 Module 16 Seep, the Discharger believes the cause and source of this new seep is likely related to the original 2021 Module 16 Partial Final Cover System seep.
44. On 10 December 2025, the Discharger submitted the ***Revised 2025 Module 16 Seep Investigation and Repair Work Plan***.
45. In a 24 March 2026 letter, Central Valley Water Board staff conditionally approved the ***Revised 2025 Module 16 Seep Investigation and Repair Work Plan***, to identify, assess, and repair the reoccurring seep located at the southwest corner of Module 16.

Excessive Recurring Surface Seeps Discharges

46. During the 2016/2017 wet season, the Discharger documented numerous seeps of leachate through the WMU covers overlying Modules 5, 11, 13, 14, 15, and 16. The Discharger also documented that the seep(s) of leachate from the Module 5 had intermingled with storm water and flowed into the Module 6 excavation. Approximately 5.6 million gallons of liquid were removed from the Module 5 Sump Area (not including actual leachate recovered from the Module 5 LCRS and the Module 6 storm water basin. Approximately 63,000 gallons of liquid were removed from the remaining Module 11, 13, 14, 15, and 16 seeps. All leachate-impacted liquid was disposed into the sanitary sewer. The occurrence of these seeps is summarized in the 16 May 2017 *Western Regional Sanitary Landfill Liquid Seeps and Response to Notice of Violation 1021626 and 1021627* report.
47. During the 2018/2019 and 2019/2020 wet seasons, the Discharger documented numerous seeps of leachate from WMU Modules 5, 12, 13, 14, and 15, and that leachate from the Module 5 seeps was again intermingling with storm water and flowing into the Module 6 storm water basin. Approximately 3.4 million gallons of leachate-impacted liquid were removed from the Module 6 storm water basin and approximately 80,000 gallons of liquid were removed from the remaining Module 12, 13, 14, and 15 seeps. All impacted liquid was disposed of into the sanitary sewer. The occurrence of these seeps is summarized in the 16 June 2020 *Re: Western Regional Sanitary Landfill Liquid Seeps – Final Report*.
48. During the 2020/2021 wet season, the Discharger documented three seeps in Module 5. The occurrence of these seeps is summarized in the 21 April 2021 *Western Regional Sanitary Landfill Liquid Seeps* report; however, it does not document the volume of liquid removed and disposed.
49. During the 2021/2022 wet season, the Discharger documented three seeps. A single seep coming out of the drainage system for the Partial Final Cover System of Module 16, and two small seeps along the eastern slope of Module 12. The occurrence of these seeps is summarized in the 15 November 2022 *Western Regional Sanitary Landfill Annual Facility Inspection Report*; however, it does not document the volume of liquid removed and disposed.
50. During the 2022/2023 wet season, the Discharger documented numerous seeps in Modules 12, 13, 14, 15, and 16. The occurrence of these seeps is summarized in the 26 January 2024 *Western Regional Sanitary Landfill – December 2021 Through April 2023 Liquid Seeps* report, which documents the removal of 73,000 gallons from the Module 12 seeps, 15 gallons from the Module 13 seeps, 3 gallons from the Module 15 seeps, and 131,753 gallons from the Module 16 seep over the reporting period. No notable volume was removed from the Module 14 seeps.
51. During the 2023/2024 wet season, the Discharger documented the reoccurrence of the Partial Final Cover System Module 16 seep. The occurrence of the seep is

summarized in the 5 April 2024 *Western Regional Sanitary Landfill – Module 16 Seep 1 March Update* report, which documents the removal of 75,000 gallons from the Module 16 seeps.

52. During the 2024/2025 wet season, the Discharger documented over 45 separate seeps across Modules 5, 12, 14, 15, and 16, as well as four separate LCRS line breaks which resulted in leachate discharges to the Facility's perimeter surface water drainage channel. The occurrence of these seeps is summarized in Monthly Update Reports which also document the removal of over a million gallons of leachate impacted liquid.
53. On 1 October 2025, the Discharger submitted the ***Final Seep Report***, which documents how each surface seep or group of seeps that occurred during the 2024/2025 wet season were addressed. According to the report, each 2024/2025 seep was addressed by excavating into the seep, removing impacted soil, and then backfilling the seep excavation with concrete, compacted clean soil, or a combination of the two. The report also concludes that the primary cause of the 2024/2025 wet season seeps was inadequate cover and poor grading. The Discharger supports this conclusion noting that while less rain fell during the 2024/2025 wet season than the previous wet season, there was a large increase in the volume of leachate removed from the LCRS during the 2024/2025 wet season.

Excessive Submembrane Liquid/Leachate

54. Based on observations made during the 18 July 2024 construction inspection, the Discharger notified Central Valley Water Board staff of damage to the partially installed Module 6 containment system. The Discharger described the damage as a "bubble" in the installed primary geomembrane near the southeastern corner of Module 6. After cutting the primary geomembrane at the "bubble", the Discharger observed water flowing under the primary geomembrane and a damaged primary geosynthetic clay liner (GCL). After draining observed water and making repairs, a subsequent second "bubble" in the installed primary geomembrane was observed near the southeastern corner of Module 6, near the quadripoint connection of Modules 5, 6, 12, and 13. To investigate the second "bubble", the Discharger made multiple exploratory cuts in the Module 6 primary geomembrane and exposed the northern limits of the Module 13 barrier system to visually identify the source of the water observed under the "bubble."
55. On 14 August 2024, Central Valley Water Board staff issued a letter directing the Discharger to: protect the integrity of Module 5 and Module 6 containment systems, determine the mechanism(s) of the Module 6 failure, investigate the source(s) of the water; recommend containment system repairs/replacement, implement repairs/replacement, and evaluate post-repair repairs/replacement conditions. On 14 February 2025, Central Valley Water Board staff issued a Water Code Section 13267 Order requiring the Discharger to complete this work within specified timelines.

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56. On 5 May 2025, Central Valley Water Board staff conditionally approved the Discharger's 15 April 2025 *Module 5/13 Liner Failure Mechanism and Water Source Investigation Work Plan*, submitted pursuant to the 14 February 2025 13267 Order, and directed the Discharger to commence work within 60 days of the letter (i.e., by **4 July 2025**).
57. On 14 July 2025, Central Valley Water Board staff inspected the Facility near the southeast corner of Module 6 where the Discharger had exposed a portion of the Module 13 anchor trench and what appeared to be the tie-in between the Module 5 containment system and the Module 13 barrier. Moisture, wetted areas, and free liquid was present in the excavated area. Free liquid was also observed in the "White" and "Brown" dry wells located near the quadripoint connection of Modules 5, 6, 12, and 13.
58. During the 2024/2025 wet season, three seeps were encountered on Module 12, just east of Module 6 in the same area as the White and Brown dry wells.
59. Between 13 March 2025 and 2 September 2026, over 66,195-gallons of liquid were removed from the "White" and "Brown" dry wells located near the far western end of Modules 12 and 13, just east of Module 6. The Brown well is believed to have been installed in Module 13 in 2020 as an 8-inch diameter, six-foot deep leachate collection drywell. The white well was installed in Module 12 sometime prior to 2020, possible 2010 or 2011; however, its purpose and construction details remain unknown.
60. Between 19 November 2025 and 2 September 2026, an additional 32,490-gallons of liquid were removed from the Modules 5, 6, 12, and 13 quadripoint to facilitate the investigation of submembrane water in this area.
61. On 8 December 2025, the Discharger submitted the 1 December 2025 **Submembrane Water Investigation Report and Repair Plan**. This report summarizes the *Module 5/13 Liner Failure Mechanism and Water Source Investigation*, which concludes that leachate and condensate from Module 13, rather than storm water, are likely the sources of the accumulation of submembrane water at the quadripoint of Modules 5, 6, 12, and 13. This Work Plan also proposes to install a simple gravel interceptor trench and back-drains to resolve the reoccurrence of submembrane water under Module 13. Central Valley Water Board staff responded to this work plan in an 18 February 2026 letter and requested the Discharger submit a revised work plan.
62. MRP requirements D.3 and E.4 prescribe requirements for documenting and reporting seeps that occur at the Facility. However, the Central Valley Water Board has determined that additional tasks are necessary to address the excessive number of recurring seeps that routinely occur across the Facility's WMUs as well as the excess amount of submembrane liquid that has been encountered in and around the quadripoint of Modules 5, 6, 12, and 13. Therefore, this Order requires the

Discharger to submit an engineering feasibility study for corrective action to address the recurring seeps that occur throughout the Facility and which are contributing to the and submembrane liquid at the quadripoint², including initiating closure or partial closure, as prescribed in the WDRs, of open WMU modules that are at or near their air-space limit, with a focus on Modules 12 and 13.

Direct LCRS Leachate Discharges

63. On 14 December 2024, the Discharger reported a discharge from the containment berm installed to contain a previously known Module 16 seep. This Module 16 seep was originally detected on 26 October 2021 and repaired on 29 September 2023. However, it resurfaced on 29 December 2023 and was awaiting repairs. The 14 December 2024 discharge was first observed at 0830, reported to be actively overflowing the containment area and discharging at an estimated rate of 7-8-gallons per minute. The discharge was controlled by 1130, with an estimated discharge of 36-gallons of leachate to the southwest, beyond the stormwater drainage ditch running along Module 16. **(Mod 16 Spill 2021-1)**.
64. On 15 December 2024, the Discharger damaged a section of leachate conveyance piping along Module 16 while trying to recover a stuck vehicle. The Discharger stated that leachate was spilling out of the damaged pipe into the landfill's perimeter storm water drainage channel at approximately 20-gallons per minute. To limit the extent of the discharge, the Discharger placed a soil berm in the storm water drainage channel downstream of the leachate spill. According to the Discharger, the pipe was repaired and approximately 100-gallons of leachate from within the bermed section of the ditch and approximately 1,000-gallons of leachate commingled with ponded storm water within the drainage channel were collected for disposal. **(Module16 Spill 1/SP2)**
65. On 23 December 2024, the Discharger identified a discharge from a sewer wet well, located across from the Facility flare, overflowing due to a plug. About 100-gallons of liquid was estimated to have been discharged from this sewer line, and at this location, the contents of the sewer line consist mostly of landfill leachate. The Discharger removed the plug, collected about 30-gallons of leachate, and began removing contaminated soil. The Discharger estimated that about 100-gallons of liquid had been discharged from this sewer wet well spill. **(Flare Sewer Spill)**
66. On 27 January 2025, the Discharger identified a discharge from a sewer wet well, located just west of the Public Tipping area. At this location, the contents of sewer line consist mostly of landfill leachate. The Discharger stopped the discharge and removed approximately 60-cubic yards of impacted soil. The Discharger did not provide the volume of leachate discharged. **(Public Tipping Sewer Spill/SP5)**
67. On 29 January 2025, the Discharger identified a failed weld on the landfill leachate

² The quadripoint is the general area around the intersection of Modules 5, 6, 12, and 13.

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pipeline located near the Facility flare. According to the Discharger, an unknown quantity of leachate flowed from this failed weld into the northern perimeter storm water drainage channel and then into the northeastern storm water basin. The Discharger stated that all leachate and impacted storm water from the discharge was fully contained in the storm water basin, and that about 20,000-gallons of leachate impacted storm water would need to be removed. However, the City of Roseville estimated the total volume of leachate contaminated storm water being withheld in the unlined northeastern storm water basin to be approximately 450,000-gallons. Due to leachate impacts to the storm water drainage channel and northeastern storm water basin, the Discharger redirected storm water around these storm water drainage features, and contained all leachate impacted storm water that flowed into the northeastern storm water basin. A total of 37 21,000-gallon Frac tanks were installed to contain this leachate discharge. As part of the Discharger's effort to redirect storm water around the northern storm water drainage channel and northeastern storm water basin, the Discharger installed a storm water drainage channel and containment basin atop Module 1 in violation of the WDRs. **(Module 1 Leachate Pipe Discharge)**

68. On 6 February 2025, the Discharger identified a failing Frac tank, located near northeastern storm water basin, which resulted in a discharge of about 4,000-gallons of leachate across the vegetated area near the Facility flare and towards the power generation area. The subject Frac tank was taken out of service, but no remediation of this area was reported. **(Module 1 - Frack Tank Failure)**

69. On 6 February 2025, the Discharger reported damage to a leachate conveyance pipe along Module 14. While working to free two stuck vehicles atop Module 14, the Discharger caught and broke a leachate line, releasing leachate into the perimeter storm water drainage channel. The Discharger stated that flow out of the leachate line was at about 5 gallons per minute and that it discharged for about 40-minutes. The Discharger took steps to contain and cleanup this leachate discharge, removing about 3,500-gallons of leachate impacted liquid from the perimeter storm water drainage channel. However, the berm installed to contain the discharge became overwhelmed after a subsequent rain event, failed, and about 3,500-gallons of leachate impacted liquid was discharged into the southwestern storm water feature. The failed berm was replaced to stop any additional leachate discharges, while the Discharger worked to remediate the leachate discharge. **(Module 14, Spill 2)**

70. On 24 February 2025, the Discharger reported a vehicle ran over LCRS transfer Sump 13, causing a discharge of about 25 gallons of leachate into the perimeter storm water drainage channel. The discharge was stopped, repaired, and berms placed in the perimeter storm water drainage channel to contain the discharge until remedial effort could be implemented. **(Module 16 CS-13 Discharge/SP8)**

71. On 27 February 2025, the Discharger reported a separate new leachate pipe break **(Module 14, Spill 3)** near the same location as the **Module 14, Spill 2** discussed in Finding 69 above. The break occurred during remedial efforts when the LCRS line

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was lifted to excavated impacted soil beneath the original Module 14, Spill 2 discharge. This discharge was stopped almost immediately, less than a gallon of leachate was discharged, and the pipe was repaired. This discharge will be addressed as part of **Module 14 Spill 2**.

72. On 3 March 2025, the Discharger reported a new Module 16 seep, southwest of where the previous **Mod 16 Spill 2021-1** discharge occurred, as noted in Finding 63 above. This seep was contained within the perimeter storm water drainage ditch (**Module 16-3/3/25 Seep**).
73. Following the occurrence of the above noted leachate discharges (Findings 63 through 72), the Discharger took preliminary steps to contain and control each discharge and has implemented, to different degrees, remedial efforts to address the discharges.
74. Remedial work to address each of the above noted landfill leachate discharges has occurred, and the Discharger has submitted reports documenting completed cleanup work. Central Valley Water Board staff have approved many of the cleanup reports; however, the Discharger has yet to complete remedial work and submit final remedial cleanup reports for each of the following leachate discharges:
1) **Mod16 Spill 2021-1** and 2) **Module 16-3/3/25 Seep**.

Legal Basis for This Order

75. Water Code section 13050, subdivision (d), states that “waste” includes,
- . . . sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for the purpose of, disposal.*
76. Water Code section 13050, subdivision (l)(1), defines “pollution” as an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects the waters for beneficial uses and/or facilities which serve these beneficial uses.
77. Sediment, when discharged to waters of the state, is considered a “waste”. Discharges of sediment and other inert materials to surface waters can cause pollution in a number of ways. Such discharges may alter the natural hydrologic and sediment transport regimes of surface waters by affecting the flow of water, sediment deposition, and establishment of vegetation. These types of changes may lead to adverse conditions such as flooding, increases in suspended sediment and turbidity, accelerated erosion of the watercourse bed or banks, and localized accumulation of deleterious materials. Additionally, such discharges directly threaten wildlife habitat and aquatic species by impacting beneficial uses such as warm freshwater habitat, cold freshwater habitat, wildlife habitat, and spawning. Increased sedimentation and

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turbidity can result in increased treatment and/or maintenance costs for downstream agricultural and municipal users impacting the following beneficial uses such as municipal and domestic supply, agricultural supply, industrial process supply, and groundwater replenishment. Sediment laden storm water discharges to surface water and the resulting turbidity can also affect the recreational and aesthetic enjoyment of the surface waters impacting beneficial uses to include contact water recreation and non-contact water recreation.

78. WDRs Order R5-2007-0047 requires the Discharger to comply with specific conditions, requirements, limitations, and prohibitions governing the Discharger's operations at the Facility. The WDRs implement applicable provisions of the Basin Plan, the Water Code, the California Code of Regulations, and other applicable federal, state, and regional requirements, policies, and plans.
79. The Basin Plan designates beneficial uses for the waters of the Sacramento River and San Joaquin River Basins, establishes water quality objectives for protection of those beneficial uses, describes implementation programs for achieving those objectives. The Basin Plan incorporates applicable federal and state requirements for water quality, including plans and policies adopted by the State Water Board.
80. Storm water is the only source of surface water at the Facility. Surface water from the Facility drains north to Orchard Creek and south to Pleasant Grove Creek. Both creeks are intermittent streams that are primarily used for agricultural purposes and that eventually flow into the Sacramento River. The Basin Plan designates the Sacramento River, between the Colusa Basin Drain and I Street Bridge, for the following beneficial uses: municipal and domestic supply; agricultural irrigation supply; water contact recreation, including canoeing and rafting; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; warm and cold migration of aquatic organisms; warm and cold spawning, reproduction, and/or early development; wildlife habitat; and navigation.
81. The Basin Plan designates all groundwater in proximity to the Facility for the following beneficial uses: municipal and domestic water supply, agricultural supply, industrial service supply, and industrial process supply.
82. Water Code section 13301 states in part,
- When a regional board finds that a discharge of waste is taking place or threatening to take place in violation of requirements or discharge prohibitions prescribed by the regional board . . . , the board may issue an order to cease and desist and direct that those persons not complying with the requirements or discharge prohibitions (a) comply forthwith, (b) comply in accordance with a time schedule set by the board, or (c) in the event of a threatened violation, take appropriate remedial or preventative action. . .*
83. The Discharger has caused or permitted, and threatened to cause or permit, waste to be discharged in violation of its WDRs. In particular:

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- a. The ongoing discharge of VOCs detected in corrective action wells and downgradient monitoring wells indicates past and ongoing discharges of waste in violation of WDRs Prohibition A.1, which prohibits discharges of hazardous wastes; Prohibition A.8, which prohibits the discharge of waste constituents to the unsaturated zone or to groundwater; Prohibition A.9, which prohibits the discharge of liquid waste to groundwater; and Facility Specification C.7, which requires that LFGs must be controlled to prevent impairment of the beneficial uses of groundwater due to migration through the unsaturated zone.
- b. The Discharger's failure to submit an AROWD proposing a revised CAP in response to the ongoing release of VOCs noted in the January 2019 NOV constitutes violation of WDRs Provision H.2, which incorporates Title 27 section 20430(j). This failure to submit and obtain Central Valley Water Board approval of a revised CAP has allowed the ongoing release to persist.
- c. The soil stockpile atop closed WMU Modules 1, 2, 10, and 11 is likely causing, and certainly threatening to cause, discharges of liquid waste and LFG from those closed units into the unsaturated zone, groundwater, and stormwater conveyance systems in violation of WDRs Prohibitions A.1, A.8, and A.9, as well as SPRRs General Prohibition V.B, which prohibits the discharge of wastes that have the potential to reduce or impair the integrity of containment structures; Closure and Post-Closure Specification IX.E, which requires that the final cover of closed landfills shall be maintained to prevent ponding and soil erosion due to high run-off velocities, and IX.L, which requires that, throughout the post-closure maintenance period, the Discharger shall maintain the structural integrity and effectiveness of all containment structures, maintain the final cover as necessary to correct the effects of settlement and other adverse factors.
- d. The LRCS level exceedances violate WDRs General Construction Specification D.7, which specifies limits on the depth of fluid in any LRCS sump; and SPRRs Construction Specification VIII.O, which requires that each LRCS be designed, constructed, maintained, and operated to collect and remove twice the maximum anticipated daily volume of leachate from the WMU. The Discharger's insufficient maintenance and operation of certain LRCS systems has likely caused, and certainly threatens to cause, discharges of waste in violation of the WDRs.
- e. The repeated unauthorized discharges of leachate, via spills and seeps, to WMUs, stormwater conveyances and storage ponds, and other areas of the facility, violate WDRs Prohibition A.2 and Discharge Specification B.1, which prohibit the discharge of wastes outside of WMU(s) specifically designed for their containment, and Discharge Specification B.5, which requires that leachate be conveyed to an offsite wastewater treatment plant for disposal.

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- f. The repeated occurrence of submembrane liquid, has caused, or threatens to cause, damage to the WMU liner systems, discharges of waste in violation of the WDRs, particularly Facility Specification VII.A and SPRRs General Prohibition V.C, which require that surface and subsurface drainage from outside of a WMU shall be diverted from WMUs.
- g. The tasks required by this Order are necessary to ensure that actual and threatened discharges of waste in violation of the Discharger's WDRs are ceased and abated and the Discharger restores compliance with its WDRs.

Applicability of Water Code section 13267

84. Water Code section 13267 authorizes the Central Valley Water Board to require dischargers to furnish, under penalty of perjury, technical or monitoring program reports that it requires. This Order requires the Discharger to submit a detailed plan and schedule for construction of Module 6 in accordance with the requirements of the WDRs. The burden, including costs, of the monitoring and reporting tasks required by this Order bears a reasonable relationship to the need for therefore and the benefits to be obtained thereby. The monitoring and reporting tasks required by this Order are almost all already required in accordance with Title 27 and the Facility's WDRs and MRP. Therefore, there is a reasonable relationship for the need of these reports and the benefit to be gained by these reports, to ensure the Discharger maintenance compliance with the Title 27 and the WDRs.

Other Regulatory Considerations

85. The State Water Board's 2024 *Water Quality Enforcement Policy* outlines how the regional water quality control boards shall prioritize enforcement actions. The Policy defines Class A priority violations as violations that potentially pose an immediate and substantial threat to beneficial uses and/or that have the potential to cause significant detrimental impacts individually or cumulatively to human health or the environment. Unless unusual, unique or exceptional circumstances exist, Class A violations ordinarily include, but are not limited to, the following:

- a. For discharges subject to Title 27 requirements, failure to implement corrective actions in accordance with WDRs. As outlined in the findings of this Order the Discharger has failed to implement, enhance, and expand the corrective action program at the site.
- b. Discharges causing exceedances of primary maximum contaminant levels for chemical constituents in receiving waters with a beneficial use of municipal and domestic supply (MUN). The uncontrolled releases of landfill gases as well as leachate has impacted the groundwater that is designated for MUN.
- c. Violations involving recalcitrant parties who deliberately avoid compliance with water quality regulations or Water Board orders.

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All other violations described in this Order are Class B violations. This order outlines the steps necessary for the Discharger to return to compliance with its WDRs and address its outstanding Class A and Class B violations.

86. Issuance of this Order is an enforcement action taken by a regulatory agency to enforce the regulatory provisions of the Basin Plan and the WDRs and is exempt from provisions of the California Environmental Quality Act (CEQA) (Pub. Res. Code, § 21000 et seq.) in accordance with California Code of Regulations, title 14, section 15321. This action is also considered exempt because it is an action by a regulatory agency for the protection of natural resources and the environment (Cal. Code Regs., tit. 14, §§ 15307, 15308). To the extent that the Order requires earth disturbing and revegetation activities not to exceed five acres in size and to ensure restoration of stream habitat and prevent erosion, such actions are considered exempt from the provisions of CEQA pursuant to California Code of Regulations, title 14, section 15333. Should additional environmental review be required in connection with future discretionary regulatory actions at this Facility, the Central Valley Water Board may recover the costs associated with preparing and processing environmental documents from the Dischargers (Pub. Res. Code, § 21089).
87. The Discharger and interested persons were notified of the Central Valley Water Board's intent to issue this Order and were provided an opportunity to comment on the proposed Order at a public hearing.
88. At a public meeting, the Central Valley Water Board heard and considered all comments pertaining to this Order.
89. Any modification to this Order must be in writing and approved by the Central Valley Water Board to be considered valid.

Required Actions

IT IS HEREBY ORDERED, pursuant to Water Code sections 13301 and 13267, that the Discharger (including its agents, employees, and affiliates) shall:

1. **Immediately** begin LCRS liquid level monitoring and reporting for each of the Facility's LCRS sumps as follows:
 - a. **Weekly from 1 October – 30 April**
 - b. **Monthly from 1 May – 30 September**

If leachate levels in any LCRS sump exceed the limit set by the WDRs (see WDRs, § D.7), the Discharger must **immediately**, or as soon as reasonably possible: a) notify Central Valley Water Board staff of the exceedance, b) take actions to quickly remove the excess leachate to restore compliance with the WDRs, c) document the additional actions implemented and volume of leachate removed, and d) continue weekly monitoring and reporting until compliance with the required leachate level for

the LCRS sump is achieved.

2. **Continue submitting** semi-annual **Corrective Action Progress Reports**, as outlined in Title 27 section 20430(h), with reports due on **31 January** and **31 July** each year. Each report must contain, at minimum:
 - a. A detailed evaluation and discussion regarding the effectiveness of the Discharger's ongoing corrective actions, as well as any efforts taken to optimize and expedite the remedial effort. This discussion must contain maps and cross-sections, showing the extent of both the vadose zone and groundwater plumes;
 - b. An evaluation of both LFG and groundwater concentrations and trends;
 - c. A discussion regarding the Discharger's proposed Compliance Schedule to complete Corrective Action.
3. **Within 90 days**, implement the 10 December 2025 *Revised 2025 Module 16 Seep Investigation And Repair Work Plan*, as conditionally approved by Central Valley Water Board staff in the 24 March 2026 letter, and submit a **Module 16 Seep Repair Report** that documents the implementation of the Work Plan. This report must also document the cleanup of the storm water drainage ditch adjacent to the seep that was impacted by this seep, as required by 24 March 2026 Central Valley Water Board staff letter .
4. **Within 90 days**, submit a **Perimeter Storm Water Drainage Work Plan** to assess, survey, and ultimately repair the perimeter storm water drainage channel around the Facility's WMUs. The intent of this work plan is for the Discharger to demonstrate that the perimeter storm water drainage channel is constructed, graded, and has been maintained to ensure storm water flowing off the WMUs is directed away from the WMUs without ponding and infiltrating along the perimeter of the WMUs.
5. **Within 90 days submit** an Amended Report of Waste Discharge Corrective Action Plan (**AROWD CAP**) that complies with Title 27 section 20430 and includes:
 - a. A detailed plan to remediate groundwater impacts from the release of waste from Modules 1, 2, 10, and 11 and to achieve compliance with the Water Quality Protection Standard adopted for the Facility in accordance with Title 27 section 20390 (see WDRs, Detection Monitoring Specifications F.3-.7);
 - b. A detailed schedule for the implementation of the CAP;
 - c. A monitoring and progress reporting plan and schedule for the CAP;
 - d. Milestones with timelines to assess the effectiveness of the CAP; and
 - e. A revised financial assurance cost estimate for the CAP.

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As stated in the 27 February 2020 Central Valley Water Board staff letter, monitored natural attenuation (MNA) does not meet the requirements of Section 20430(c) of Title 27, which requires the Discharger to implement corrective action to reestablished concentration limits by “removing the waste constituents or treating them in place”. Therefore, MNA would only be acceptable for a landfill that was clean closed in accordance with Section 21090(f) of Title 27. Consequently, the required AROWD CAP is to contain a proposal to install and operate a remedial system similar to that proposed in the 19 January 2022, *Focused Engineering Feasibility Study Groundwater Pump & Treat System Report* or an alternative remedial proposal as discussed in the 19 April 2022 meeting.

6. **Within 180 days**, submit a **Final Leachate Discharge Report** documenting all work completed to stop, repair, and remediate the following outstanding 2024/2025 leachate discharges: **Mod 16 Spill 2021-1** and **Module 16-3/3/25 Seep**. This report should document: a) the total volume of leachate released, b) the amount of leachate and leachate impacted storm water contained and properly disposed, c) the volume of impacted soil removed, d) the fate of all disposed leachate impacted liquid and soil, e) the results of all post excavation and remedial samples, and f) a description of all restoration efforts for each noted leachate discharge. The report shall also contain the results of all background samples and an evaluation of the effectiveness of the remedial actions taken for each leachate discharge.
7. **Within 180 days**, submit an **Engineering Feasibility Study** for corrective action to address the recurring seeps across the Facility’s WMUs and the submembrane liquid at the quadripoint connection of Modules 5, 6, 12, and 13, and closure or partial closure, in accordance with the WDRs, of open WMU modules that are at or near their air-space limit. The **Engineering Feasibility Study** shall contain, at minimum:
 - a. A discussion regarding the nature and likely cause of reoccurring seeps and submembrane liquid across the Facility’s WMU modules;
 - b. An assessment of potential improvements to WMU design to ensure landfill leachate is controlled within each WMU and that it is directed to each WMU LCRS without surfacing or is extracted as leachate to prevent surfacing;
 - c. An assessment of potential improvements to WMU operations to prevent future seeps from occurring;
 - d. An assessment of potential seep and submembrane liquid mitigation and prevention measures to be implemented if new seeps and submembrane liquid occur after the issuance of this Order, so that once repaired, they do not reoccur; and
 - e. An in-depth assessment and evaluation for initiating closure, in accordance with the WDRs, of open WMU modules that are at or near their air-space limit, with

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additional attention given to the closure of Modules 12 and 13, which are likely in part responsible the ~98,685 gallons of liquid removed from beneath the liner at the quadripoint connection of Modules 5, 6, 12, and 13 between March 2025 and 2 September 2026.

8. **Within 180 days**, submit a **Soil Stockpile Removal Work Plan** that contains proposed tasks and an expedited schedule for completing those tasks, not to exceed five (5) years, to restore compliance with the WDRs and remove the soil stockpiles atop Modules 1, 2, 10, and 11. This Work Plan must include a proposal to restore and reconstruct the cover atop these Modules and to replace all LFG corrective action wells associated with these Modules.
9. **Within 5 years**, complete implementation of the **Soil Stockpile and Removal Work Plan** by removing all stockpiled soil, restoring/reconstructing the cover atop each Module impacted by the soil stockpile, and replacing all LFG corrective action wells associated with these Modules.
10. **Within 180 days**, submit a proposed **Release Response Plan** outlining standardized procedures for:
 - a. Rapid containment, sampling, and repair of any new seep(s) or spill(s) of leachate, condensate, or other waste liquids;
 - b. Timely monitoring and reporting in accordance with the WDRs;
 - c. Recording the total volume of liquid collected from each seep or group of seeps, as well as the total collected from all seeps each wet season; and
 - d. Training of appropriate Facility staff to ensure that the Discharger's representatives are familiar with and prepared to implement the Release Response Plan and the WDRs.
11. **Within 90 days of Central Valley Water Board staff concurrence with the Release Response Plan**, implement the proposals outlined in the Plan and document staff and contractor training.
12. **Within 180 days of Central Valley Water Board staff approval of the AROWD CAP**, implement the Revised CAP and all associated monitoring and reporting. Reporting of the implementation of the Revised CAP, as well as all ongoing Corrective Action, shall continue be documented in the required Semi-Annual **Corrective Action Progress Reports**, as discussed in Requirement 1 above.

General Requirements and Notices

Use of Qualified Professionals

13. All technical reports required by this Order that involve planning, investigation,

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evaluation, or design, or other work requiring interpretation and proper application of engineering or geological sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1. As required by these laws, completed technical reports must bear the signature(s) and seal(s) of the registered professional(s) in a manner such that all work can be clearly attributed to the professional responsible for the work.

Signatory Requirements

14. All technical reports submitted by the Discharger shall include a cover letter signed by the Discharger, or a duly authorized representative, certifying under penalty of law that the signer has examined and is familiar with the report and that to their knowledge, the report is true, complete, and accurate. The Discharger shall also state if they agree with any recommendations/proposals and whether they approve implementation of said proposals. Any person signing a document submitted under this Order shall make the following certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my knowledge and on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Notice of Change in Ownership or Occupancy

15. The Discharger shall file a written report on any changes in the Facility's ownership or occupancy. This report shall be filed with the Central Valley Water Board no later than 30 days prior to a planned change and shall reference the number of this Order.

Compliance with Other Regulatory Requirements

16. The Discharger shall obtain all applicable local, state, and federal permits necessary to fulfill the requirements of this Order prior to beginning work.

Submissions

17. All required data, documents, and technical reports must be uploaded to GeoTracker (GeoTracker ID: L10007939295) and you must notify us by e-mail at centralvalleysacramento@waterboards.ca.gov after each report is uploaded. To ensure each GeoTracker upload notification is routed to the appropriate Staff, please include the following information in the body of the email: Attn: Paul Sanders, Compliance Unit, Title 27, the Date and Title of the report uploaded, the GeoTracker upload confirmation number for the report uploaded, and the Facility's CIWQS place ID (CW-272229).

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If you have any questions regarding this Order or the Facility's regulatory history, please contact Paul Sanders at paul.sanders@waterboards.ca.gov or at (916) 464-4817.

If the Discharger fails to comply with the requirements of this Order, the Central Valley Water Board or its delegee may refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order may result in the assessment of administrative civil liability of up to \$5,000 per violation per day, depending on the violation, pursuant to the Water Code, including sections 13268 and 13350. The Central Valley Water Board reserves its right to take any enforcement actions authorized by law.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050, et seq. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: (http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request).

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I, PATRICK PULUPA, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order issued by the California Regional Water Quality Control Board, Central Valley Region, on [DATE]

Patrick Pulupa
Executive Officer

Enclosure 1

Table 1: MODULE 6 CONSTRUCTION PROJECT (EXCAVATION/STOCKPILING AND LINING)

Date	From	To	Type	Notes
3/4/2022	WPWMA	Vinoo J	Email	WPWMA submitted a Soil Stockpile Technical Report describing the WPWMA's intent to excavate Module 6 and place a portion of the excavated soil atop Modules 1, 2, 10, and 11. The email explained the project necessity arising from the fire in the WPWMA's sorting facility in November of 2021. As a result of the damage to the MRF, a greater than anticipated amount of waste required disposal at the landfill. The increased demand on the landfill necessitated that the WPWMA accelerate the timeline for development of Module 6. WPWMA requested that Water Board staff review the project by May 1, 2022 in order to meet the schedule of the completion of Module 6 prior to running out of airspace.
3/7/2022	Vinoo J	WPWMA	Email	The WB promptly responded requesting additional technical details/clarifications from WPWMA. The requested details were included in the original technical report that had been transmitted by WPWMA to the WB on March 4.
3/10/2022	WPWMA	Vinoo J	Email	WPWMA replied to the WB and identified where the details and clarifications were located within the technical report.
3/10/2022	Vinoo J	WPWMA	Email	WB Staff brought up concerns regarding leachate generation based around the compression of the waste mass. An analysis addressing the waste compression component of leachate generation using the HELP model was included in the originally submitted technical report.
3/15/2022	CalRecycle	WPWMA	Letter	CalRecycle reviewed the Soil Stockpile Technical Report; CalRecycle's only comment was that it required that the CQA Plan, Tech Specs, and Plans be submitted via GeoTracker.
Mar-22	Vinoo J	WPWMA	Email	Several informal emails were sent back and forth between WPWMA and WB staff including comments from WB staff concerning waste units not included in the project scope and other concerns that were already addressed in the technical report. Due to the nature of the informal comments, WPWMA chose to wait for formal comments on the report before proceeding.
7/25/2022	WPWMA	Vinoo J	Email	After waiting for 3 months (2 months past the WPWMA's initially requested review date), WPWMA staff requested an update on formal comments on the Soil Stockpile technical report.

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Date	From	To	Type	Notes
7/26/2022	Vinoo J	WPWMA	Email	WB staff replied and indicated that the WB would provide formal comments by the end of that week (i.e., Friday 7/29/2022).
8/18/2022	WPWMA	WB	Email	WB Staff did not provide formal comments to the WPWMA. After an additional month passed, WPWMA asked for another update on formal comments. Due to the timeline that WPWMA had originally indicated at the start of the review process, WPWMA staff noted that the planned start date for the excavation of Module 6 was 9/12/2022 which was a hard deadline in order to maintain continuous operation of the landfill.
9/9/2022	WB	WPWMA	Letter	WB staff transmitted a letter to the WPWMA at 4pm on Friday September 9, 2022, 1 business day before the scheduled start date, stating that the WPWMA did not have approval to start the project. At the time of the letter, no formal comments had been provided by the WB. The "non-approval" letter also did not include formal comments. Due to the financial and environmental risks of postponing the project further, WPWMA proceeded with the excavation project as scheduled, with no concerns indicated from CalRecycle or the Placer County LEA.
9/12/2022	-	-	Meeting	WPWMA initiated a virtual meeting between WB staff and WPWMA staff. WB staff simply reiterated their stance of "non approval" for the project and did not articulate technical issues/comments on the stockpile technical report. WPWMA staff noted that the project needed to continue and that it was expected that WB staff would adequately review and consider the entirety of the project.
9/19/2022	WB	WPWMA	Letter	WB submitted a letter to the WPWMA documenting formal comments for the Soil Stockpile Project. Comments were primarily about the logistics/semantics of the final cover over Modules 1, 2, 10 and 11.
9/23/2022	WPWMA	WB/CalR	Letter	WPWMA submitted the CQA Plan, Construction Plans, and Technical Specifications to WB and CalRecycle.
10/6/2022	WB	WPWMA	Insp./ Letter	Letter documenting NOV from 9/30/2022 was submitted by WB to WPWMA noting the requirement of: project slope stability analysis (already included in the technical report), reactivation of the LFG System (which was phased in order to ensure LFG collection in Modules 1, 2, 10, and 11 throughout the entirety of the project), and resolution of the financial assurances for the soil stockpile removal (to be addressed in an update to the JTD).

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10/19/2022	WPWMA	WB	Letter	WPWMA submitted a letter to WB addressing all violations: Seismic analysis of the stockpile would be added to JTD, CAP reactivation/improvements would be conducted, and that the WPWMA would work to update financial assurances.
11/17/2022	WPWMA	WB	Letter	A revised technical report was submitted by the WPWMA to address the comments made in the 9/19/2022 WB letter. Additional clarifications and calculations requested by the WB were also included.
12/16/2022	WPWMA	WB	Letter	WPWMA submitted the Module 6 Liner Design Documents to the WB and requested review by March 24, 2023 since contract bidding was scheduled for April 2024. WPWMA invited WB to facilitate a design review meeting to expedite the process if possible.
4/4/2023	WB	WPWMA	Letter	WPWMA received Module 6 Design Comments near the requested date. WB provided 123 comments in total, 10 of which were directly related to the Liner design. The WPWMA modified the construction documents to address 8 of those comments. The other 2 comments were rejected and WPWMA staff and their design consultant (WSP) provided adequate reasoning/calculations for rejected comments. The remaining 113 comments related to: operational questions regarding the fill of Module 6, minor drawing label errors, questions about elements already presented in the design documents, etc. and did not have any bearing on the project.
9/11/2023	WPWMA	WB	Letter	WPWMA Submitted a comprehensive comment response matrix to the 123 comments provided. WPWMA also attached a drainage analysis technical memorandum and subgrade settlement analysis as requested. All comments addressed were also included in the construction plans/specification documents as appropriate.
11/1/2023	-	-	-	Liner installation began with an estimated completion date of March 2024. Original Landfill Lifetime analyses required Module 6 to be ready for waste May 1, 2024.