

**San Diego Regional Water Quality Control Board**

**TO:** John Odermatt

**FROM:** Kelly Dorsey  
Susan Pease 

**DATE:** June 20, 2016

**SUBJECT:** STAFF RECOMMENDATION FOR COUNTY OF SAN DIEGO  
PROPOSED THREAT TO WATER QUALITY AND COMPLEXITY  
RECLASSIFICATION FOR SAN MARCOS LANDFILL

The County of San Diego (County) provided its *Proposed TTWQ and CPLX Classification Change San Diego County Closed and Inactive Landfills* (Proposal) to the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) on January 22, 2015.

The Proposal includes an evaluation of the current Threat to Water Quality (TTWQ) and Complexity (CPLX) classifications for the County's eleven closed and inactive landfills, including the San Marcos Landfill. The County proposes a reduction of the San Marcos Landfill's TTWQ and CPLX classification from 1B to 3B. We have reviewed the Proposal and provide the following analysis and recommendations based on the information provided by the County and the information available in San Diego Water Board records.

**TTWQ Classification, Proposal, and Analysis**

Section 2200, of California Code of Regulations (Cal. Code Regs.) title 23 provides direction for determining regulatory fees for landfills using the following TTWQ and CPLX Ranking Criteria:

1. Category "1" – Those discharges of waste that could cause the long-term loss of a designated beneficial use of the receiving water. Examples of long-term loss of a beneficial use include the loss of drinking water supply, the closure of an area used for water contact recreation, or the posting of an area used for spawning or growth of aquatic resources, including shellfish and migratory fish.
2. Category "2" – Those discharges of waste that could impair the designated beneficial uses of the receiving water, cause short-term violations of water quality objectives, cause secondary drinking water standards to be violated, or cause a nuisance.

3. Category "3" – Those discharges of waste that could degrade water quality without violating water quality objectives, or could cause a minor impairment of designated beneficial uses as compared with Category 1 and Category 2.

As noted in section 2200, the San Diego Water Board should consider the duration, frequency, seasonality, and other factors that might limit the impact of the discharge when assigning TTWQ categories.

The County proposed a reduction in the San Marcos landfill's TTWQ from Category 1 to Category 3 based on historical groundwater data analysis that indicates low level volatile organic compounds (VOCs) are only detected at the site below Maximum Contaminant Levels, and VOC levels in downgradient monitor wells are stable. The County's analysis further indicated that chloride, calcium, and manganese were the only constituents to exceed site specific water quality protection standards (WQPS) in background or down-gradient monitor wells. These constituents were detected during the 3<sup>rd</sup> Quarter 2014. Additionally, the County asserted that the impacts to groundwater are minor impairments with no loss to beneficial uses.

The exceedance of WQPS for chloride, calcium, and manganese during the 3<sup>rd</sup> Quarter 2014 monitoring event indicates a discharge of waste to waters of the State. Additionally, detections of chloride, mercury, and sulfate above the WQPS during the October 2015 to March 2016 groundwater monitoring event indicates a recent discharge. Also, the following chlorinateds were detected above detection limits but less than WQPS: 1,1-dichloroethane, 1,1-dichloroethene, 1,4-dichlorobenzene, benzene, dichlorodifluoromethane, diethyl ether, methyl-tert-butyl ether, tetrachloroethene, tetrahydrofuran, and trichloroethene. The presence of a discharge is more consistent with a Category 2 TTWQ classification because the discharge impaired the designated beneficial uses of the receiving water and caused a short-term violation of water quality objectives. In addition, the discharge could cause a violation of the secondary drinking water standards and/or a nuisance condition. The presence of a discharge at the landfill is inconsistent with the section 2200 classification criteria for a Category 3 TTWQ. Therefore, the staff recommendation is to change the current TTWQ and CPLX classification for the San Marcos Landfill from 1B to 2B.

### **Santa Ana Regional Water Quality Control Board TTWQ and CPLX Classification Methodology**

The County requested that the San Diego Water Board utilize the Santa Ana Regional Water Quality Control Board (Santa Ana Water Board) methodology, as developed in the Santa Ana Water Board's *Site Maintenance and Water Quality Monitoring at Closed, Abandoned, or Inactive Nonhazardous Waste Landfills within the Santa Ana Region* (Order No. R8-2013-0010), to determine the TTWQ and CPLX classifications for all County Closed, Abandoned, or Inactive (CAI) Landfills in the San Diego region.

The San Diego Water Board's approach to classifying landfill's TTWQ and CPLX appropriately applies the three criteria in section 2200 in consideration of the climatic

and physical conditions of the San Diego region. Therefore, we see no need to use the Santa Ana Water Board approach.

**Recommendation**

We recommend the TTWQ and CPLX ranking for the San Marcos Landfill change from 1B to 2B. This change to the San Marcos Landfill TTWQ and CPLX ranking would result in a substantial fee reduction.

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