



California Regional Water Quality Control Board

San Diego Region



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May 21, 2009

Ms. Vicky Gallagher
County of San Diego
Department of Public Works
5201 Ruffin Road, Suite D
San Diego, CA 92123

In reply refer to:
210029:cpowell

Dear Ms. Gallagher:

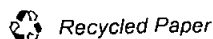
SUBJECT: OCTOBER 2008-MARCH 2009 SEMI-ANNUAL AND 2008 ANNUAL MONITORING REPORT, DETECTION MONITORING PROGRAM, BONSALL LANDFILL, SAN DIEGO COUNTY, CALIFORNIA

The "October 2009-March 2009 Semi-Annual and 2008-Annual Monitoring Report, Detection Monitoring Program, Bonsall Landfill" (the Report) prepared by Geosyntec Consultants, dated April 2009 was received on April 27, 2009. The Report documents the results of the October 2008 through March 2009 semi-annual and 2008 annual monitoring for the Evaluation Monitoring Program at Bonsall Landfill as required by Order No. 97-15 and Order No. R9-2008-0097.

The California Regional Water Quality Control Board, San Diego Region (Regional Board) reviewed the Report and has the following comments:

1. Transmittal letter, Compliance Record. Order No. 97-15, Monitoring and Reporting Program requirement D.3.b requires a "comprehensive discussion of the compliance record, result of any corrective actions taken or planned which may be needed to bring the discharger into full compliance with the waste discharge requirements." This section has been expanded from previous reports to identify conditions that are not in compliance with Order No. 97-15, and a site chronology has been added to describe the actions that have been taken. However, the revised discussion does not contain a discussion of the effectiveness of the corrective action or a discussion of what activities are planned to bring the site into compliance.

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2. Operation, Monitoring, and Maintenance of the Landfill Gas (LFG) Control Facilities. Both of the monthly monitoring reports included document that over 1,000 gallons of condensate water each month were transferred to San Marcos Landfill. San Marcos Landfill is a closed landfill and is not permitted to receive wastes. Please provide waste manifests in future reports to document that the condensate water is disposed of appropriately.
3. Operation, Monitoring, and Maintenance of the Landfill Gas (LFG) Control Facilities. Both of the monthly monitoring reports included in the Report recommend repairs to the well heads. This recommendation has been made by SCS in all reports provided to the Regional Board for review since December 2007. In the comment letter for the last Semi-annual report, the Regional Board requested a schedule for performing this maintenance. The County's response to this letter¹ stated that future monitoring reports would include a schedule of corrective actions to be taken. A schedule was not included in this Report or the Amended Report of Waste Discharge (ROWD). Please provide a detailed plan for this work including a schedule for performing the upgrades.
4. 1.1 Terms of Reference, Page 1. This section describes the Report as being part of a "Detection Monitoring Program (DMP)." The purpose of a DMP is to detect a release from the landfill. Order No. R9-2008-0097, included findings that a release from the landfill has been documented and, pursuant to Title 27 section 20385, an Evaluation Monitoring Program shall be instituted. The semi-annual and annual reports prepared for Bonsall Landfill must meet the reporting requirements in Order No. 97-15 and Order No. R9-2008-0097. Requirement A.1.e of Order No. R9-2008-0097 requires that data for soil-gas and groundwater must be provided semi-annually. Soil-gas data were not provided in this Report, although it was included in the Amended ROWD. Future annual and semi-annual monitoring reports must comply with all the applicable reporting requirements in Order No. 97-15 and Order No. R9-2008-0097.²
5. 2.4 Analytical Results, Page 5. The Sampling and Analysis Plan stated that "to evaluate trends in concentrations of COCs in groundwater samples during evaluation monitoring, analysis using Mann-Kendall, Sen's Slope Estimator, or a combination thereof will be used." The only analysis provided in the Report appeared to be based on visual inspection of time versus concentration plots, concluding that concentrations of VOCs were "generally consistent with historical

¹ Letter from Ms. Victoria Gallagher, San Diego County Department of Public Works; to Ms. Julie Chan, Regional Board; December 12, 2008.

² Email from Mr. Veryl Wittig, Geosyntec Consultants; to Ms. Cheryl Prowell, Regional Board; November 21, 2008.

results" with two exceptions. Please provide a statistical analysis as proposed in your Sampling and Analysis Plan and required by Title 27 Section 20415(e)(7). Given that the concentrations of waste constituents (including tetrachloroethylene and trichloroethylene) in downgradient wells were generally consistent with historic results, the Regional Board considers this to be evidence that the existing corrective measures are ineffective and that additional corrective actions should be implemented.

6. 3.1.2 General Chemistry, Page 7. The discussion in this section identified increased concentrations of waste constituents in two wells. Please provide a revision to this section and include a discussion of whether the observed increases are consistent with the known existing release of waste constituents from the landfill or whether the increases indicate a new or expanding release of waste constituents.
7. 3.2 Compliance Record, Page 9. This section provides a lengthy discussion of Regional Board actions regarding assistance in negotiating property access needed to delineate the release to groundwater. This discussion omitted the meeting conducted on December 3, 2008, in which the County requested Regional Board assistance to obtain property access to two wells, the Regional Board agreed to assist in negotiating access to these two wells because the wells are in close proximity to the site are specifically named in Order No. 97-15 and the County had been attempting to negotiate access to these properties for a matter of years. Since that time, the County was able to negotiate access to well OFBO-1 without Regional Board involvement and the Regional Board has met with the land owner (on May 4, 2009) for monitoring well BOGW-8 to discuss his concerns. Failure to sample well BOGW-8 remains a violation of Order No. 97-15 Monitoring and Reporting Program requirement C.3.a.

The discussion in Section 3.2.6 implies that the County has sent a single letter requesting property access to 27 property owners who have not responded, and that the County is waiting to conduct any additional activities until the Regional Board provides assistance. The County of San Diego is the responsible party named on Order No. 97-15 and Order No. R9-2008-0097. The County should proceed in good faith to attempt to follow up with the non-responsive property owners, and provide documentation of all efforts to obtain property access, before requesting assistance from the Regional Board.

Available resources may limit the Regional Board's ability to provide assistance to the County, however, that condition does not relieve the County from their responsibilities to comply with Order Nos. 97-15 and R9-2008-0097.

8. 3.2.3 LFG Extraction Well Assessment. Maintenance Specification 1.B.8 in Order No. 97-15 requires that "landfill gas be controlled as necessary to ensure that landfill gases and gas condensate are not discharged to surface waters or ground waters." This section documents that significant amounts of water or condensate were measured in onsite extraction wells. Further, Maintenance Specification 1.B.9 in Order No. 97-15 requires that "any necessary construction, maintenance, or repairs of precipitation and drainage control facilities shall be completed to prevent erosion, ponding, flooding, or to prevent surface drainage from contacting or percolating through wastes at the facility." The Report states, "it was concluded that the significant amounts of moisture and condensate in wells may be resulting from the percolation of surface waters into the waste body." The Amended ROWD presents proposals for upgrades to the LFG Extraction Well system as well as upgrades to the drainage control facilities at the landfill. Please provide a detailed plan, including a schedule, for the upgrades that are required to achieve compliance with Order No. 97-15.
9. Table 1. There appears to have been a data entry error in Table 1. The "depth to bottom reported in the previous Semiannual report, submitted October 30, 2008 indicated a depth to bottom in well BOGW-1 on July 28, 2008 of 96.00 feet. The Report presents the depth to bottom on July 28, 2009 as 95.70 feet and the depth to bottom on January 1, 2009 to be 96.00 feet. A similar discrepancy appears to exist for data concerning well BOGW-12S. Please review this table for accuracy and revise as necessary. The Regional Board requested an explanation of how the changes to the depths of the wells reported in the prior semiannual report were identified and if there are any implications regarding future use of the wells.³ Your response to that request indicated that the requested information would be included in the next Monitoring report but that information could not be located in this Report. Failure to provide the requested information raises concerns about the accuracy of the technical reports and the usability of the affected monitoring wells.
10. Appendix A, Site Maintenance Plan. The approximate limits of waste fill, as illustrated on the maps labeled as Figures 1 and 4 in the Site Maintenance Plan, do not agree with the current extent of waste fill indicated on Figure 2 in the Report. Please revise the limit of waste fill on the affected figure(s) based upon the most current information. Also, ensure that the Stormwater Pollution Prevention Plan (SWPPP) has been updated to include all areas containing wastes.

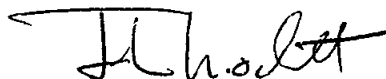
³ Letter from Ms. Julie Chan, Regional Board; to Ms. Victoria Gallagher, November 21, 2008 (see Comment 5).

11. Appendix B, Groundwater Sample Collection and Field Calibration Logs. The logs document that the waste purge water from all wells was "collected and sprayed." Discharge of waste liquids to any final-covered portion of an MSW landfill is not allowed without an exception made by the Regional Board based on a finding that the discharge of liquid will not cause the wastes to exceed the moisture holding capacity within the landfill.⁴ Based on the information provided in the Amended ROWD and discussed in comment 8 above, it seems likely that the moisture holding capacity of the wastes have already been exceeded and discharge of waste liquids onto the cap is not appropriate. Future reports must include documentation that all waste liquids are disposed of at an appropriate off site facility.

12. Appendix B, Groundwater Sample Collection and Field Calibration Logs. Provide an explanation for why wells BOGW-12D and BOGW-12S were purged using a portable pump then sampled using a disposable bailer, instead of sampling using the portable pump as was done during the July 2008 sampling event.

The next semi-annual monitoring report is due on **October 30, 2009**. In the subject line of any response, please include the requested "In reply refer to:" information located in the heading of this letter. For questions pertaining to the subject matter, please contact Ms. Cheryl Prowell at (858) 467-2745 or cprowell@waterboards.ca.gov.

Respectfully,



JOHN R. ODERMATT, M.Sc. P.G. #6139, Senior Engineering Geologist
Northern San Diego County Groundwater Unit
JRO:clp

via email: Ms. Rebecca Lafreniere, Supervising Environmental Health Specialist
County of San Diego Solid Waste Local Enforcement Agency
9325 Hazard Way, San Diego, CA 92123

⁴ Maintenance Specification B.4 and Title 27 sections 20200(d) and 21090(a)(5).

Order No. 97-15 and R9-2008-0097
GeoTracker No. L10001753716
CIWQS Place ID 210029
Reg. Measure No. 365050
Violations 819347
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