
Central Coast Regional Water Quality Control Board

July 6, 2018

VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7016 1370 0001 7680 8397

Mr. Keith Quinlan
City of Lompoc Solid Waste Superintendent
100 Civic Center Plaza
Lompoc, CA 93436
Email: K_quinlan@ci.lompoc.ca.us

Dear Mr. Quinlan:

NOTICE OF VIOLATION AND WATER CODE SECTION 13267 REQUIREMENT FOR TECHNICAL INFORMATION: LOMPOC LANDFILL, SANTA BARBARA COUNTY

Central Coast Regional Water Quality Control Board (Water Board) staff inspected the Lompoc Landfill (landfill) on May 15, 2018, accompanied by City of Lompoc (City) staff. During the inspection Water Board staff identified violations of Waste Discharge Requirements Order (WDR) No. R3-2003-0014 and Water Quality Control Order No. 2014-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000001, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities (General Industrial Stormwater Permit). Please read this Notice of Violation carefully, as it explains your potential liability, requires the City to implement actions to correct violations identified during the site inspection, and requires a report documenting proposed corrective actions by a specific due date.

Water Board staff conducted the inspection to evaluate City staff reported damage to the landfill drainage system from a March 22, 2018 storm event. Water Board staff observed significant erosion along the west side drainage channel (Attachment 1 – photos 1 and 2) during the inspection. The channel is an unlined drainage conveyance adjacent to the landfill footprint. The channel carries stormwater from the upper landfill area to a small sediment basin. Runoff from the March 22, 2018 storm event caused significant erosion and eventual failure of the drainage channel allowing runoff to flow through a hole in the channel to a lower drainage channel. The volume of sediment discharged to the sediment basin and beyond was significant (Attachment 1 – photos 3 and 4).

Alleged Violations

WDR Order No. R3-2003-0014 – Specification C.16 requires drainage facilities be designed, constructed, and maintained to accommodate anticipated precipitation, and peak surface runoff flows from a 100-year, 24-hour rainstorm event. The landfill's overall drainage facilities are not sized to accommodate the required design storm event.

The west side drainage channel failed during a storm event that was less than the 100-year, 24-hour storm event. Sediment from the drainage channel flowed into the upper landfill sediment basin severely reducing the basin's capacity. The upper landfill basin is not designed based on the area draining to the basin, but rather the size is based on the limited area available. As of the May 15, 2018 site inspection, the basin had not been cleaned out and a significant volume of eroded material remained in the basin. Even if the basin had been designed to treat landfill runoff from a 100-year, 24-hour storm event, the capacity would have been significantly diminished due to the volume of material deposited in the basin during the January and March 2018 storm events.

General Industrial Stormwater Permit – Section V.A states the following – *“Dischargers shall implement BMPs that comply with the BAT/BCT requirements of this General Permit to reduce or prevent discharges of pollutants in their storm water discharge in a manner that reflects best industry practice considering technological availability and economic practicability and achievability.”*

Lined drainage channels are standard industry practice to prevent erosion and sediment transport at landfills. The west side drainage channel is not over waste and is not subject to potential damage caused by waste settlement. Therefore, the City should collect stormwater in lined conveyances that are designed to transport runoff without causing erosion.

The General Industrial Stormwater Permit includes requirements to submit an Exceedance Response Action (ERA) Report when site stormwater discharges exceed numeric action levels. The City submitted an ERA Report on December 14, 2017, because of elevated total suspended solids (TSS) concentrations contained in stormwater runoff. The City's ERA Report concluded that the elevated TSS concentrations were the result of natural background soils in the slopes surrounding the landfill.

However, WDR Order No. R3-2003-0014 Specification C.18 (Design Criteria) requires diversion and drainage facilities be designed in accordance with Title 27 section 20365(c)(4) to control and intercept run-on, to isolate uncontaminated surface waters from water that might have contacted waste (i.e., onsite stormwater runoff, seepage, leachate, etc.). Diverting run-on around the landfill should reduce the concentration of TSS associated with landfill activities. The City must evaluate options for diverting run-on around the landfill in a manner that doesn't mobilize additional sediment. Routing run-on around the landfill would eliminate background soils as a source of TSS in stormwater runoff while reducing the volume of water that the City must manage in the drainage system.

Required Information

The City of Lompoc must submit a technical report by **October 31, 2018**, outlining the City's plan to correct the drainage channel erosion and capacity issues. The City must develop a plan to convey stormwater flows from a 100-year, 24-hour storm event while minimizing sediment transport and preventing additional drainage system failures. At a minimum the report must address the following:

1. Short term measures to minimize erosion and maintain retention basin capacity during the 2018-19 rainy season. Including detailed plans for removing sediment from the onsite basin prior to and during the rainy season. The removed sediment should be placed and managed to avoid erosion and sediment remobilization.

2. Long-term plan to install permanent measures to address site drainage issues. Including options for diverting run-on around the landfill to reserve sediment basin capacity for the control of landfill runoff. The plan should incorporate a fill sequencing plan to identify future flow patterns and properly size drainage and retention facilities to accommodate anticipated flows, including run-on flows if the plan does not completely mitigate these flows.
3. A schedule with timelines for submitting drainage analyses, engineering design reports and corrective action implementation reports documenting completion of the required actions.

Legal Requirements

The Water Board's requirement that the City of Lompoc submit a technical report and schedule is made pursuant to Section 13267 of the California Water Code. Pursuant to section 13268 of the California Water Code, a violation of a California Water Code section 13267 requirement may subject the City to civil liability of up to \$1,000 per day for each day in which the violation occurs.

The Water Board needs the required information to evaluate and ensure compliance with Waste Discharge Requirements. The City is required to submit this information because on May 15, 2018, Water Board staff inspected the Lompoc Landfill and observed noncompliance with Waste Discharge Requirements and the City is the operator and landfill property owner and responsible for the discharge. Water Board staff discussed the evidence supporting this requirement with City staff on May 15, 2018. The evidence supporting this requirement is included in WDR Order No. R3-2003-0014 and on GeoTracker at the following link:

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=L10008948495

The burden, including costs, of the report bears a reasonable relationship to its need and the benefits to be obtained. More detailed information is available in the Water Board's public file on this matter.

Any person aggrieved by this action of the Central Coast 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 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of the order, except that if the thirtieth day following the date of the order falls on a Saturday, Sunday, or state holiday, the petition must be received by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions will be provided on request, or may be found on the internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality/

If you have any questions, please contact **Ryan Lodge by phone at (805) 549-3506** or email at ryan.lodge@waterboards.ca.gov, or Matthew Keeling at (805) 549-3685.

Sincerely,

Thea Tryon
Supervising Engineering Geologist

Attachment: City of Lompoc Landfill May 15, 2018 Site Inspection Photos

cc: [via email]

Lisa Sloan, Lisa.Sloan@sbcphd.org

Dianne Ohiosumua, Dianne.Ohiosumua@CalRecycle.ca.gov

Matthew Keeling, Matt.Keeling@waterboards.ca.gov

David Innis, David.Innis@waterboards.ca.gov

Ryan Lodge, Ryan.Lodge@waterboards.ca.gov

\\ca.epa.local\RB\RB3\Shared\LDU\Facilities\PERMITTED\Lompoc\LompocLF_NOV.docx

Attachment 1

City of Lompoc Landfill May 15, 2018 Site Inspection Photos

Photo 1 – West side drainage channel with large eroded hole.



Photo 2 – Side view of eroded hole in drainage channel. Arrow points to an area that broke through and drained to lower drainage channels. Stormwater flowed to lower channels until the hole collapsed in on itself, eventually blocking the flow to the lower channels.



Attachment 1 - City of Lompoc Landfill May 15, 2018 Site Inspection Photos

Photo 3 – Sedimentation basin with significant volume of material. Photo taken on May 15, 2018.



Photo 4 – Sedimentation basin shown in Photo 3 taken on February 22, 2018 after January 9, 2018 storm event caused earlier erosion.

