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CIWMB

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Peter Wilson, Governor

E OF CALIFORNIA

## CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

8800 Cal Center Drive  
Sacramento, California 95826

MAR 16 1995

Ms. Alice Gimeno  
Department of Toxic Substances Control  
Region No. 1, Base Closure Unit  
245 W. Broadway, Suite 350  
Long Beach, California 90802

Subject: Applicable or Relevant and Appropriate Requirements for  
the MCRD Disposal Area (Inactive Landfill) San Diego  
Naval Training Center, San Diego, California.

Dear Ms. Gimeno:

Thank you for the opportunity to review the "Draft Work Plan For Extended Site Inspection, Streamlined Risk Evaluation and Engineering Evaluation/Cost Analysis, MCRD Disposal Area (Inactive Landfill) Naval Training Center, San Diego, California" received March 14, 1995. After an initial review of the document it is apparent that this will be an accelerated cleanup that would require our applicable or relevant and appropriate requirements (ARARs). Staff is familiar with the "Presumptive Remedy for CERCLA Municipal Landfill Site" guidance and hope that we can contribute our experience with landfill closure and remediation to ensure that an accelerated cleanup is achieved. Provided below is an explanation of our ARARs, then an initial determination of deficiencies in the work plan.

The California Integrated Waste Management Board (CIWMB) has the following general statutory and regulatory authority:

- ▶ Statutory authority: The Integrated Waste Act of 1989, as embodied in Public Resources Code Section 40000 *et seq.*
- ▶ Regulatory authority: Title 14, California Code of Regulations, Division 7.

Pursuant to Public Resources Code Sections 43021 and 43509 the CIWMB has adopted regulations that include substantive standards for the design, operation, maintenance, closure, and ultimate reuse of solid waste disposal sites. These regulations are contained in the California Code of Regulations, Title 14 (14 CCR), Division 7.

The enclosed table provides 14 CCR ARARs for closure and postclosure maintenance of solid waste disposal sites. These ARARs are being submitted pursuant to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 121(d) and the National Contingency Plan.

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Ms. Gimeno  
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After an initial review of the work plan it appears that landfill gas monitoring requirements contained in 14 CCR 17783 Landfill Gas Monitoring and Control, would provide useful and applicable monitoring criteria for the work plan. Since the work plan shows on page 3-16 and 3-18 that the landfill is producing decomposition gas which contains 53 percent methane by volume, 3,160 parts per billion per volume (ppbv) of vinyl chloride and 8,400 ppbv of benzene and there are structure in the landfill vicinity, the landfill gas monitoring and control standards of 14 CCR 17783 should be of significant concern.

If you have any questions or changes regarding ARAR determination or substantive requirements, please contact John Clinkenbeard (916) 255-2346 prior to forwarding to the Navy, so that the CIWMB can assure consistent application of its requirements throughout California.

Sincerely,



Tamara Zielinski  
Waste Management Engineer  
Closure and Remediation Branch  
Permitting and Enforcement Division

Enclosure: Table, "State ARARs for Solid Waste Disposal Sites  
Closure and Postclosure Maintenance"

California Code of Regulations, Division 7, Chapter 3  
Article 7.8, Disposal Site Closure and Postclosure

cc: Mr. John Anderson, Regional Water Quality Control Board  
Ms. Michele M. Stress, San Diego County Solid Waste Local  
Enforcement Agency

## State ARARs for Solid Waste Disposal Site Closure and Postclosure Maintenance

| Source  | Standard, Requirement, Criterion, or Limitation  | ARAR Status | Description  | Comment   | Associated Site                     |
|---|--|-------------|--|---|-------------------------------------|
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17766<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance          | Applicable  | Emergency Response Plan (ERP): potential emergency conditions that may exceed the design of the site and could endanger the public health or environment must be anticipated. Response procedures for these conditions must be addressed in the RD/RA plans. | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17767<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance          | Applicable  | Security at Closed Sites: all points of access to the site must be restricted, except permitted entry points. All monitoring, control, and recovery systems shall be protected from unauthorized access.   | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17773<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance          | Applicable  | Final Cover: the design and construction of the final cover must meet specific prescriptive standards. These include minimum thickness and quality of the construction material.   | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17774 (a)to(h)<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance | Applicable  | Construction Quality Assurance (CQA): a CQA program must be designed and implemented. It must include specific parameters (and for some components specific testing methods) for each component of the final cover.  | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17776<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance          | Applicable  | Final Grades: the final grades for the covered landfill must meet grading standards provided in 23 CCR 2581, they must be appropriate to control runoff and erosion.   | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17777<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance          | Applicable  | Final Site Face: the design of the final site face must provide for the integrity of the final cover both under static and dynamic conditions.<br><i>earthquake</i>  | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17778<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance          | Applicable  | Final Drainage: the design of the final cover must control runoff and runoff produced by a 100 year 24 hour storm event and must be prepared according to CQA requirements.  | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760. | San Diego NTC<br>MCRD Disposal Area |

## State ARARs for Closure and Postclosure Maintenance of Solid Waste Disposal Sites

| Source  | Standard, Requirement, Criterion, or Limitation   | ARAR Status | Description  | Comment   | Associated Site                     |
|---|---|-------------|--|---|-------------------------------------|
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17779<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance | Applicable  | Slope Protection and Erosion Control: the design and construction of the slopes must protect the integrity of the final cover and minimize soil erosion.   | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.   | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17781<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance | Applicable  | Leachate Control During Closure and Post Closure: leachate must be monitored, collected, treated, and discarded appropriately.   | The state does not intend that subsurface leachate monitoring and collecting systems need to be added to existing landfills unless leachate production and/or accumulation is evident.    | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17783<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance | Applicable  | Gas Monitoring and Control During Closure and Post Closure: landfill gases must be collected and analyzed; the concentration of combustible gas at the landfill boundary must be 5% or less, trace gases must not be at levels that cause adverse health or environmental impacts. | Monitoring should be conducted for 30 years or until authorized to be discontinued by showing that there is no potential threat to public health and safety or the environment.           | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17788<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance | Applicable  | Post Closure Maintenance: the landfill must be maintained and monitored for no less than 30 years following closure.   | Monitoring is continued for 30 years following closure unless it can be demonstrated that the landfill does not pose a threat to public health and safety or a threat to the environment. | For closing sites                   |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43020 | 14 CCR 17796<br>Chapter 3, Article 7.8<br>Disposal Site Closure and Postclosure Maintenance | Applicable  | Post Closure Land Use: Site Closure Design shall show one or more proposed uses of the closed site or show development that is compatible with open space. Changes in postclosure land use must be approved by the appropriate State agency prior to implementation.               | Closure or Postclosure Maintenance Standard of Title 14, CCR, Chapter 3, Article 7.8. Scope and Applicability pursuant to 14 CCR 17760.   | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43509 | 14 CCR 18262.3<br>Chapter 5, Article 3.4<br>Closure and Postclosure Maintenance Plans       | Applicable  | Provides the content requirements for closure plans for solid waste disposal sites.  | Applies to solid waste disposal sites that received waste after January 1, 1988.  | San Diego NTC<br>MCRD Disposal Area |
| California Integrated Waste Management Act of 1989<br>PRC 40502 & 43509 | 14 CCR 18265.3<br>Chapter 5, Article 3.4<br>Closure and Postclosure Maintenance Plans       | Applicable  | Provides the content requirements for postclosure maintenance plans for solid waste disposal sites.  | Applies to solid waste disposal sites that received waste after January 1, 1988.  | San Diego NTC<br>MCRD Disposal Area |

14 CCR - California Code of Regulations, Title 14

ARAR - applicable or relevant and appropriate requirement ... ROD - Record of Decision RD/RA - remedial design/remedial action

TOTAL P.05

REPRODUCED AT GOVERNMENT EXPENSE

ENCLOSURE  
CALIFORNIA CODE OF REGULATIONS,  
DIVISION 7, CHAPTER 3, ARTICLE 7.8,  
DISPOSAL SITE CLOSURE AND POSTCLOSURE

COMMENTS ON THE DRAFT WORK PLAN FOR  
EXTENDED SITE INSPECTION, STREAMLINED  
RISK EVALUATION AND ENGINEERING  
EVALUATION/COST ANALYSIS, MCRD DISPOSAL  
AREA - INACTIVE LANDFILL

THE ABOVE IDENTIFIED ENCLOSURE IS NOT  
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY  
SOUTHWEST DIVISION TO LOCATE THIS  
ENCLOSURE. THIS PAGE HAS BEEN INSERTED  
AS A PLACEHOLDER AND WILL BE REPLACED  
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA**  
**RECORDS MANAGEMENT SPECIALIST**  
**SOUTHWEST DIVISION**  
**NAVAL FACILITIES ENGINEERING COMMAND**  
**1220 PACIFIC HIGHWAY**  
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**TELEPHONE: (619) 532-3676**