

Los Angeles Regional Water Quality Control Board

July 5, 2012

Khalil M. Gharios, Division Manager
Solid Resources Processing and Construction Division
City of Los Angeles Bureau of Sanitation
1149 S. Broadway, 8th Floor
Los Angeles, CA 90015

APPROVAL OF CORRECTIVE ACTION COST ESTIMATE FOR KNOWN OR REASONABLY FORESEEABLE RELEASES TO WATER – LOPEZ CANYON LANDFILL, LAKE VIEW TERRACE, CALIFORNIA (FILE NO. 69-068, WDID No. 4B190321009)

Dear Mr. Gharios:

City of Los Angeles, Bureau of Sanitation (Discharger) is the operator of the Lopez Canyon Landfill (Landfill) located at 11950 Lopez Canyon Road, Los Angeles, California. The current waste discharge requirements (WDRs) for the Landfill is contained in Order No. R4-2004-0176, adopted by the Los Angeles Regional Water Quality Control Board (Regional Board) on December 13, 2004. The monitoring and reporting program (M&RP), which is part of the WDRs, was revised December 6, 2011. Section I.F of the M&RP requires the submittal of a corrective action cost estimate for a known or reasonably foreseeable release to water. Applicable requirements for corrective action financial assurance (CAFA) are included in sections 22220 to 22222 of the California Code of Regulations, Title 27 (27 CCR). Section 22221(b) of 27 CCR requires operators of applicable disposal facilities, as is the case for the Landfill, to demonstrate financial responsibility to the Regional Board and the California Department of Resources Recycling and Recovery (CalRecycle) for initiating and completing known or reasonably foreseeable corrective action in at least the amount of the greater of either a Water Release Corrective Action Estimate or a Non-Water Release Corrective Action Estimate.

The Regional Board is in receipt of the letter titled "*Corrective Action Cost Estimate for Known or Reasonably Foreseeable Release to Water*" (Letter), that you submitted on March 14, 2012. The Letter indicates that there are three general scenarios of foreseeable release that may occur at the Landfill. Release Scenario-1 describes a subsurface leachate release with an estimated CAFA cost of \$1,587,398. Release Scenario-2 describes a fuel release from underground storage tanks used on site to fuel trucks, tractors, and other equipment with an estimated CAFA cost of \$173,717. Release Scenario-3 describes a surface release of liquids from equipment used onsite with an estimated CAFA cost of \$20,000. Hence, the Discharger has developed a cost estimate to fund a number of third party activities required to evaluate and remediate impacted groundwater and soil on site. The estimate includes the costs for installing and operating five groundwater extraction wells near the area of the release and three additional groundwater monitoring wells, as well as excavation and disposal of impacted soils. Two of the extraction wells are predicted to be greater than 350 feet in depth and would require electrical pumps, while the other wells would be operated by pneumatic pumps that would operate by air from the flair station at the Landfill. The groundwater/leachate would be discharged directly to the sanitary sewer for treatment and disposal. The Letter proposes a CAFA cost estimate of **\$1,781,115** for the evaluation,

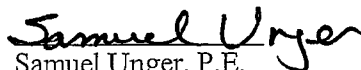
feasibility study, third party corrective action construction, third party corrective action operation, and monitoring and reporting.

We have reviewed the Letter and determined that the proposed cost estimate complies with section 22221 of 27 CCR and satisfies requirements of the WDRs. The proposed water release CAFA cost estimate is therefore approved.

This letter is copied to CalRecycle to convey a notification that the proposed corrective action cost estimate has been approved by Regional Board staff. The Discharger is directed to work with CalRecycle staff to provide acceptable financial assurance mechanism in accordance with 27 CCR sections 22225 et seq.

If you have any questions, please contact Mr. Doug Cross, Project Manager, at (213) 620-2246, or Dr. Wen Yang, Chief of Land Disposal Unit, at (213) 620-2253.

Sincerely,


Samuel Unger, P.E.
Executive Officer

cc: Scott Walker, California Department of Resources Recycling and Recovery
Peter Jan, California Department of Resources Recycling and Recovery